

CHAPTER 5 EMPLOYMENT

General Comments

This supporting text was responded to by 8 people/organisations.

Support	0
Object	4
Comment	4

Overarching Summary

- Development of a large town centre at West Of Braintree Garden Community will adversely affect the viability of Braintree
- Aspiration to achieve one job per dwelling is quite ambitious and no evidence that this target can be met
- Only airport related business should be allowed at Stansted Airport
- There should be an oversupply of industrial space to depress land values and to keep rents low
- The Local Plan must be revised to reinforce a commitment to B1(c) and B2 businesses in all three garden villages
- Greater effort required to increase local employment opportunities to reduce long commutes
- Objection to over-reliance on Stansted Airport as a driver for job creation
- No sound assessments to evidence commercial viability of creating employment and retail investment and opportunities for residents of the new settlements that would prevent them from commuting and shopping in existing urban centres and thereby exacerbating already crowded streets and parking, and in Saffron Walden exacerbating illegal air quality hot spots

Statutory consultees and other bodies

WeAreResidents.org support comments made by Saffron Walden Town Council.

SERCLE note that a large single Town Centre provided as part of WoB could have a detrimental impact on the sustainability and vigorous activity of Braintree town centre and may well affect its viability. It is evident that WoB cannot not be self-sustaining given that it has limited employment opportunities, making it a dormitory settlement reliant on commuting. The major employer in the area is Stansted but WoB has no direct access to Stansted other than by road. The AECOM aspiration is to achieve one new job per one new dwelling is acknowledged by AECOM that this "employment scenario is quite ambitious and the achievability depends on many different factors, some of which are too difficult to influence." There is no real evidence presented that this employment target can be met. BDC's assumption that 25% of the community will work from home is completely unrealistic, unfounded and there is no evidence to substantiate that whatsoever.

Developers/landowners/site promoters

Policy EMP1 supported but have following reservations and suggestions:

- Only airport related business be encouraged at the airport
- Increased space allocation at Great Dunmow will attract staff from the immediate area of Braintree and take advantage of the road links offered by the A120/A12 to docks and M11 to London and the Midlands.
- Significant space allocation in the general area of the ill-conceived Uttlesford North would support start up and larger companies building on the innovation from the Cambridge science and technology
- Industrial space Class B2 in particular should be oversupplied in order to depress land values and keep rents low this will attract and keep businesses in the area

- Welcome the policy to allow conversion of redundant agricultural buildings but see no reason why demolition and replacement with more space and energy efficient replacements where they are considered to be suitable locations
- All new commercial buildings should require solar power and battery storage as it becomes more commercially available
- The B1383 (old A11) needs to be improved with the settlements bypassed to minimise the impact of HGV's and increased traffic on the existing settlements

Individuals

- The Local Plan, should continue to encourage manufacturing of products that take advantage of Britain's skill set as opposed to low cost mass market products
- The local plan must be revised to reinforce a commitment to B1(c) and B2 businesses in all three garden villages
- There should be a strategy to provide more employment and housing for people in CDE social classes
- Strategy should include better basic skills provision and greater technical skills provision
- Greater effort required to increase local employment opportunities to reduce long commutes
- Sections on employment and retail are aspirational and vague
- No sound assessments to evidence commercial viability of creating employment and retail investment and opportunities for residents of the new settlements that would prevent them from commuting and shopping in existing urban centres and thereby exacerbating already crowded streets and parking, and in Saffron Walden exacerbating illegal air quality hot spots
- Objection to over-reliance on Stansted Airport as a driver for job creation
- Jobs created at Stansted Airport are primarily low grade
- Overestimation of jobs growth has contributed to overinflated population growth projections
- Difficult to attract new employment to District
- High grade of initiative is required
- Failure of RDA initiative to achieve regional growth due to poor level of senior

Introduction

Paragraphs 5.1 - 5.3

This supporting text was responded to by 7 people/organisations.

Support	0
Object	2
Comment	5

Overarching Summary

- Rather than "in association with new garden communities", this should read "as an integral part of new garden communities". This would seem to be a basic requirement of GC principals and would also contribute to sustainability of GCs; and
- Not enough local business or employment opportunities to match the proposed housing. Job shortfall.
- This requires good transport links to the enterprise areas.
- The policy of settling 3 new garden communities in this area and attracting the amount of high skilled and high paid work to sustain this vast volume of people to the area is not borne out based on the council's current track record, where it appears to be a hugely reliant on commuting for the current residents. More towns are not the answer but a cohesive policy to attract good quality companies and work to the area to service the current growing communities and to relieve the need for commuting and

the pressures on the transport infrastructure. Basically to make us competitive to attract jobs, rather than build these new commuter towns in inappropriate locations increasing current North Essex issues!

- I am very concerned to see that projected employment numbers at Stansted Airport, which have previously been quoted as the raison d'etre for the new housing developments in Harlow, are now being recycled and reused as 'evidence' that the Easton Park development will also supply these same employees/jobs with housing.
- The draft Plan focuses discussion of employment largely on Stansted Airport and Chesterford Park. Many new employment site identified are small. Identifying larger potential employment sites should be a priority to attract larger businesses and a greater range of employment. The plan relies heavily on residents of new settlements working locally to achieve sustainable communities, but there is little detail on how this will be achieved. In North Uttlesford, there is the opportunity to bring in large numbers of high skill and ancillary jobs by attracting high tech companies from Cambridge, as we understand that some are now unable to find single sites there of sufficient size for their long term needs.
- This statement is the 'Aim' as laid out in the development strategy relating to Thaxted. It is detailed on page 12 of the strategy under the heading 'Town Centres' Query: What is tangible? How is this to be achieved in a market town with diminishing industry and agricultural land being utilised for new homes.

Statutory consultees and other bodies

Two – Littlebury Parish Council and Thaxted Parish Council

Developers/landowners/site promoters

None

Individuals

- Rather than "in association with new garden communities", this should read "as an integral part of new garden communities". This would seem to be a basic requirement of GC principals and would also contribute to sustainability of GCs.
- Key Areas of Concern: Not enough local business or employment opportunities to match the proposed housing. Job shortfall.
- This requires good transport links to the enterprise areas.
- The policy of settling 3 new garden communities in this area and attracting the amount of high skilled and high paid work to sustain this vast volume of people to the area is not bourn out based on the council's current track record, where it appears to be a hugely reliant on commuting for the current residents. More towns is not the answer but a cohesive policy to attract good quality companies and work to the area to service the current growing communities and to relieve the need for commuting and the pressures on the transport infrastructure. Basically to make us competitive to attract jobs, rather than build these new commuter towns in inappropriate locations increasing current North Essex issues!

Sustainability Appraisal June 2017

Not applicable

Employment Land Requirements

Paragraph 5.4 – 5.10

This paragraph was responded to by 4 people/organisations.

Support	0
Object	1
Comment	3

Overarching Summary

- Please state where the Employment Land Review Update 2017 can be found.
- As currently worded would appear to restrict development within existing and proposed employment areas to Class B uses. It is considered that such a restriction is unnecessary and is likely to unduly prohibit sustainable employment generating development, which may otherwise be delivered. For these reasons Policies EMP2 and EMP1 and the supporting text at paragraphs 5.46 and 5.4 as currently drafted are not compatible with National Planning Policy set out in the NPPF and do not represent the most appropriate approach to planning for sustainable economic development. Consequently, it is considered that the draft Local Plan remains unsound' in the context of paragraph 182 of the NPPF and requires amendment as set out below, which would address our objections. Para 5.4 - Revise to include the following sentence after the fifth bullet point: It is also acknowledged that other appropriate sui-generis and complementary employment generating uses may be permitted within employment areas as guided by EMP1 and EMP2.
- The ELR seems to be based upon a direct link between population growth and employment requirement - this takes no account of the expansion requirements of existing business or inward migration (e.g. from NE London or Harlow) of businesses looking to locate in the District. Local and highly respected commercial agents, Coke Gearing has advised the respondents that it is their experience through the many enquiries they receive that urgent provision of sites is needed now to meet a known demand.
- Timeframes for the delivery of the floorspace figures quoted under Paragraph 5.7 should be specified, given that UDC has a vested interest in the delivery of the site.
- Predicted 900 jobs at Great Chesterford Research Park should not be used as a justification for the allocation of North Uttlesford Garden Village (NUGV).
- Whether the risk posed by Brexit and the impact this will have on employment and housing need has been considered.

Statutory consultees and other bodies

None

Developers/landowners/site promoters

- Policy EMP1 and EMP2, as currently worded would appear to restrict development within existing and proposed employment areas to Class B uses. It is considered that such a restriction is unnecessary and is likely to unduly prohibit sustainable employment generating development, which may otherwise be delivered. For these reasons Policies EMP2 and EMP1 and the supporting text at paragraphs 5.46 and 5.4 as currently drafted are not compatible with National Planning Policy set out in the NPPF and do not represent the most appropriate approach to planning for sustainable economic development. Consequently, it is considered that the draft Local Plan remains unsound' in the context of paragraph 182 of the NPPF and requires amendment as set out below, which would address our objections. Para 5.4 - Revise to include the following sentence after the fifth bullet point: It is also acknowledged that other appropriate sui-generis and complementary employment generating uses may be permitted within employment areas as guided by Policies EMP1 and EMP2
- The respondents object to the Plan on the following basis :- Paragraph 5.4- The ELR seems to be based upon a direct link between population growth and employment requirement - this takes no account of the expansion requirements of existing business or inward migration (e.g. from NE London or Harlow) of businesses looking to locate in the District. Local and highly respected commercial agents, Coke Gearing has advised the respondents that it is their experience through the many enquiries they receive that urgent provision of sites is needed now to meet a known demand.

Individuals

- Please state where the Employment Land Review Update 2017 can be found.

- It would have been useful if the numbers quoted had timescales attached so that future relative to what can be assessed. The vested interest of UDC make this more important information.
- Predicted 900 jobs at Chesterford Research park does not warrant the building of a North Uttlesford Garden Village (NUGV). Given that Chesterford Research Park is the largest local employer to NUGV one can only surmise the dwellings will be purchased by commuters to Cambridge and London. Therefore not meeting an Uttlesford housing need.
- Has anyone considered the risk posed by Brexit on future estimates of employment and housing need? It is possible according to some that there will be severe economic consequences resulting from Brexit and it is likely that the mix of industry in the country will change. Particularly financial services and other London-focused industries. I feel there is good reason to be extremely cautious about the proposed scale of development.

Sustainability Appraisal June 2017

Not applicable

Jobs Growth

Paragraph 5.11 – 5.15

This paragraph was responded to by 7 people/organisations.

Support	0
Object	4
Comment	3

Overarching Summary

- The difference of 10 JPA between the Medium and High Growth scenario's is doubtful;
- The number of new jobs does not equal the number of houses proposed;
- Significant numbers of extra jobs will need to be provided throughout the district to avoid the planned additional housing simply increasing out commuting;
- The figures provided are broad assumptions without evidence;
- Concerns that growth is based on unreliable figures of employment. The STAL projection provided in its G2 application of 15,300 jobs looks more accurate.
- The figures provided are broad assumptions without evidence.
- Where can the BRES be found?
-

Statutory consultees and other bodies

- Littlebury Parish Council
- Takeley Parish Council
- **STANSTED AIRPORT** - There are concerns that growth is being based on unreliable figures of employment. The figure of 8,000 extra jobs comes from a report for UDC by consultants Hardisty Jones (being an increase from 10,000 jobs in 2011) whilst this appears fairly relative as the estimate of 18,000 jobs for 35mppa (as indicated from Stansted Airport employment survey) appears too high. The STAL projection provided in its G2 application of 15,300 jobs looks more accurate. In the 2015 Stansted Airport employment survey only 18.3% of airport employees are Uttlesford residents (A figure which includes overseas workers living in temporary rented accommodation in Uttlesford). It should be noted that the latest employment statistics (June 2017) show unemployment in Uttlesford at just 2.1% compared to the national average of 4.7% and a claimant count for

unemployment benefits of just 245 (0.5%) in UDC compared to a national average of 1.9%. The Airport Employment survey done in 2015 said only 18.3% of its employees lived in Uttlesford. Therefore the need to ensure transport links are sustainable is a greater priority.

The District already has high numbers of out-commuters. It is our view that this reflects both the high local skill base mentioned in the plan but also limited local employment opportunities. Significant numbers of extra jobs will need to be provided throughout the District to avoid the planned additional housing simply increasing out commuting. Appendix 4 states that at least one new job should be created in new settlements for every home built. Increasing the number of jobs over and above the numbers of new homes would enable out commuting to be reduced, improve job opportunities for all residents and the sustainability of the local economy.

Developers/landowners/site promoters

Paragraphs 5.11/12/13- these seem to be broad assumptions without evidence?

Individuals

- Doubts over the numbers given that high growth is shown as only 10JPA above medium growth. I would have expected medium growth to be between 400 and 550JPA.
- In section 19 it states "New Garden Cities must provide a full range of employment opportunities, with the aim of no less than one job per new household." The number of new jobs quoted here does not equal the number of houses proposed.
- Where can the BRES be found?

Sustainability Appraisal June 2017

Not applicable

Office Floorspace Requirements

Paragraph 5.16 – 5.17

This paragraph was responded to by one individual.

Support	0
Object	0
Comment	1

Overarching Summary

- Where can the ELR and Employment Land Monitoring be found?

Statutory consultees and other bodies (Arial, sentence case, size 11)

None

Developers/landowners/site promoters

None

Individuals

- Where can the ELR and Employment Land Monitoring be found?

Sustainability Appraisal June 2017

Not applicable

Industrial Land Requirements

Paragraph 5.18 – 5.21

This paragraph was responded to by 6 people/organisations.

Support	0
Object	0
Comment	6

Overarching Summary

- There is a surplus of vacant new warehousing space at London Stansted Airport. Takeley PC does not believe that new warehousing should be built elsewhere within its parish and that there is a suitable area within the airport to provide for ancillary businesses of the airport.
- Local Plan should make provision to encourage occupation of these units. Perhaps reduced rates for a period of time? Offer business incentive? Policy should reflect the commercial market need.
- Local Plan should provision alternative sites for office accommodation for SW. Industrial/warehouses should be converted to office accommodation to reflect market need.
- Need to identify appropriate mitigation measures to improve the capacity of the junction 8 of the M11 to take account of the cumulative impacts of growth from residential and airport related development, including aspiration for 'strategic' warehouse and distribution depots
- Saffron Walden is blighted by failure of successive administrations to address the traffic flow and pollution issues through the town. There is poor access for commercial vehicles leading to loss of retail opportunities, and poor facilities for visitors to the centre.
- The difficulty of accessing the M11 from Saffron Walden suggests that efforts be made to secure a junction nearer the town. But, it could be argued that not having a junction close to the town eases development pressures.

Statutory consultees and other bodies

Takeley Parish Council - It is noted there is a surplus of vacant new warehousing space at London Stansted Airport and little prospect of the un-used and under-used parts of the northern ancillary area at the airport being brought into beneficial use in the early part of the Local Plan. In light of this, Takeley PC does not believe that new warehousing should be built elsewhere within its parish and that there is a suitable area within the airport to provide for ancillary businesses of the airport.

Saffron Walden Town Council

- (Para 5.20 Bullet Point 3) Noting the excess in industrial and warehouse units in SW. What policies are in place to address that? Is this being addressed via the UDC Economic Development team?
Proposed Change: Local Plan should make provision to encourage occupation of these units. Perhaps reduced rates for a period of time? Offer business incentive? Policy should reflect the commercial market need.
- (Para 5.20 Bullet Point 2) **Comment:** Regarding employment, notes there is an acute lack of modern office accommodation in SW. The Local Plan should therefore seek to look for alternative land on the outskirts of town? **Proposed Action:** Local Plan should provision alternative sites for office accommodation for SW. Industrial/warehouses should be converted to office accommodation to reflect market need.

East Hertfordshire District Council - The Plan states there is an aspiration for 'strategic' warehouse and distribution depots in locations with ready access to Junction 8 of the M11. Linked to the comment on Policy SP11, such aspirations will need to take account of the cumulative impacts of growth from residential and airport related development within East Herts and Uttlesford districts on the junction and the need to identify appropriate mitigation measures to improve the capacity of the junction.

Developers/landowners/site promoters

None

Individuals

- Saffron Walden is blighted by failure of successive administrations to address the traffic flow and pollution issues through the town. There is poor access for commercial vehicles leading to loss of retail opportunities, and poor facilities for visitors to the centre.
- The difficulty of accessing the M11 from Saffron Walden suggests that efforts be made to secure a junction nearer the town. But, it could be argued that not having a junction close to the town eases development pressures.

Sustainability Appraisal June 2017

Not applicable

Opportunities within Existing 'Clusters' assessed in the ELR

Paragraph 5.24 - 5.27

This paragraph was responded to by one organisation.

Support	0
Object	0
Comment	1

Overarching Summary

- Note that the Printpack factory is a safeguarded employment site as per Appendix 6;
- Saffron Walden Business Centre not shown as an existing employment site on the Saffron Walden inset map, whilst it is shown as an Existing Employment Site in Appendix 6 (Site 18);
- The boundary of the Business Centre should be expanded to include the Homebase store.

Statutory consultees and other bodies

Saffron Walden Town Council

Note that the Printpack site is a "Safeguard employment site" as per Appendix 6. This paragraph notes that "these sites will be retained for employment use as described under policy EMP1" It is interesting it does not include the current Homebase Site as employment land. Conclusion: Error in Maps as the SW Business Centre (behind Homebase) is not shown on the employment map. We insist that the land currently occupied by Homebase is also included in the employment land map.

Developers/landowners/site promoters

None

Individuals

None

Sustainability Appraisal June 2017

Not applicable

Existing Commitments

Paragraph 5.28

This paragraph was responded to by one individual and one organisation.

Support	0
Object	1
Comment	1

Overarching Summary

- Where is the latest monitoring data?
- Great Chesterford Research Park (GCRP) and land at London Stansted Airport is not suitable for larger shed development. GCRP the site is not suitable for larger shed development and land at the airport is subject to significant constraint.

Statutory consultees and other bodies

None

Developers/landowners/site promoters

Paragraph 5.28 “ The respondents remind the Council that these sites have already been developed and are now occupied. Whilst the Council acknowledge that new employment land needs to be allocated for future demand, which has been calculated as 10.2 ha up to 2033, the current demand, which is significant, is not being met with a ready supply of good quality employment land, as a result, the Council is missing out on job creation opportunities. The draft plan makes provision for an additional 10.2 ha, which is to form part of allocations at existing sites at Chesterford Research Park and at London Stansted Airport (Northern Ancillary Area). In the case of the former, the site is not suitable for larger shed development, which is in demand now, and in the case of the latter, the availability of land here is subject to significant constraints, see Para 3.6 below.

Individuals

Where is "The latest available monitoring data (April 2016)"?

Sustainability Appraisal June 2017

Not applicable

Saffron Walden

Paragraph 5.29

This paragraph was responded to by one individual.

Support	0
Object	0
Comment	1

Overarching Summary

- What information is there on the number of people working from home and how this maybe supported, as this can help reduce traffic.

Statutory consultees and other bodies

None

Developers/landowners/site promoters

None

Individuals

Is there any information available on the number of people working from home, mainly using IT, and how this may be supported? It does reduce traffic.

Sustainability Appraisal June 2017

Not applicable

Gaunts End, Elsenham

Paragraph 5.31

This paragraph was responded to by one individual and four organisations.

Support	0
Object	4
Comment	1

Overarching Summary

- What information is there on the number of people working from home and how this maybe supported, as this can help reduce traffic?

Statutory consultees and other bodies

Elsenham Parish Council - Gaunts End, Elsenham, is within Stansted Airport Countryside Protection Zone, and as such it should not attract further development.

Developers/landowners/site promoters

What is planned for around Elsenham and sites close to the station?

- Paragraph 5.31 this site is poorly located in terms of transport (other than car) and is the wrong side of the airport- the development is stalled due to lack of occupier interest (it is not 40% pre let).
- Comments Cheergrey Properties wish to object to the latest proposals for their site at Elsenham in the Regulation 18 Local Plan (the current draft Local Pan). The current draft Local Plan only

identifies a small and incomplete part of the overall site as an employment site (policy EMP1) rather than the site as a whole, which was shown in previous versions of the Plan. The property is referred to throughout the draft plan as either Elsenham Industrial Estate or Gaunts End. Please note that our preference is to refer to the site as City Meadows, Elsenham and this is how we shall refer to the site in this report. For the avoidance of doubt, the land which we are referring to, and which we submit should be allocated as an employment site in its entirety, is shown below in Figure 1.

- Figure 1, City Meadows, Elsenham. There has been a long process of Plan development leading up to the current draft Local Plan and extensive discussions with Cheergrey Properties in relation to the Plan and the TriSail development (approved in April 2012). Throughout that period the Council has been supportive of Cheergrey's plans for further development of the wider site until, without explanation or justification, the current draft Local Plan fails to allocate the site for development. Cheergrey Properties has had a legitimate expectation that the site would continue to be allocated for development and has invested considerable resources in providing infrastructure for growth and in preparing a planning application and EIA to further develop the site as a mixed use economic centre. This work and investment has been undermined by the recent change of policy. The current draft Local Plan fails to provide any explanation or evidence for this change of policy and, indeed, the evidence base on which the Plan is supposedly based provides compelling reasons why the site should continue to be allocated. It appears that the Council has failed to understand the vision for the site, the drivers of the local economy and the opportunity for inward investment and employment growth that further development here would provide. We expand on these points below. Change of Policy Cheergrey first made representations on the draft Uttlesford Core Strategy in November 2007 and again in April 2010. These comments identified the need and potential to allocate further employment land at City Meadows, Elsenham. In support of this we submitted to the Council a Masterplan which explained our vision for creating a mixed use economic centre for the 21st century. In April 2011 the Employment Land Review Report acknowledged that the existing estate is functioning well and recommended the allocation of further land for B1 business development, noting that development in this location is accessible by bus which provides direct links to Elsenham, Stansted Airport and Stansted Mountfitchet. The first phase of the Masterplan, the TriSail Towers, was approved by the Council in April 2012. This comprises 8370 sqm. of prestige office development in three interlinked buildings, with a mix of ancillary supporting uses at ground floor level, including a food retail outlet, a cafe, dentist and health spa. TriSail Towers is under construction and currently scheduled for completion in 2018. Following further discussions with the Council, the wider site within Cheergrey ownership was allocated for B1 business development in 2012 in Policy S2 of the Uttlesford Draft Local Plan. The Plan stated that the prestigious development planned in this location would have the potential to bring substantial economic benefits and would be likely to attract further investment and Elsenham Local Policy 4 contained detailed criteria to be complied with in developing the site with which we agreed. This site allocation was taken forward into the next version of the Plan, the Uttlesford Local Plan - Pre-Submission Consultation, April 2014, in which Elsenham Policy 7 allocated the site for B1A business use (Figure 2). Figure 2 Previous Local Plan Allocation. Elsenham Policy 7 stated that the following criteria must be met: The development will be of a high architectural standard of design which constitutes a prestigious development that may facilitate the attraction of headquarter offices; The development minimises the need for travel by private car by improving the bus service to and from the site; The development is acceptable in terms of its design, materials, traffic generation, impact on the landscape, effect on the operation of Stansted Airport and any other relevant planning considerations; The development should include landscape screening along the boundaries of the site; The development will facilitate the implementation of any associated road improvements that are necessary as a consequence, and The development is designed to mitigate adverse effects upon existing residential and community interests and may be required, by legal agreement, to provide or contribute towards wider and longer term planning benefits reasonably associated with the alleviation of any such impact. The application should be accompanied by a Transport Assessment, Approved Drainage Strategy and other required documents and any recommended improvements/remedial works will be controlled through the legal obligation. Development will need

to be implemented in accordance with the Master Plan and design guidance approved by the Council and other Development Management policies. Implementation of the Master Plan proposals will be regulated by legal obligation in association with the grant of planning permissions. Cheergrey welcomed this allocation and these criteria and successfully made representations that the policy would be strengthened if reference was also made to ancillary mixed use development as well. We reiterated that this has always been an integral part of our vision for the site, to create a high quality business and employment destination, and that a range of ancillary support uses are necessary to effectively deliver that vision, such as the ancillary retail and service uses which were planned as part of TriSail Towers. The Council accepted these arguments and the Schedule of Proposed Minor Modifications, in July 2014 amended the policy wording of Elsenham Policy 7 to include reference to ancillary supporting mixed uses. At the Examination of the Local Plan on 21 November 2014 Cheergrey gave evidence in support of the Local Plan employment strategy. Although the Plan was subsequently withdrawn because the Inspector had concerns relating to the housing strategy and Sustainability Appraisal it is noteworthy that he had no concerns with the proposed site allocation at City Meadows, Elsenham and referred to the Employment Land Review as a good example of its kind, that it provides a clear market-based picture of the types and locations of sites which should be newly allocated and he noted that the main recommendations of the report are generally taken forward into the plan. In 2015 there was a further Call for Sites and Cheergrey again submitted representations to support allocation of the wider site at City Meadows, Elsenham (Figure 1). These were supported by the Council and the representation was classified as site 01Els15. The conclusions of the Council's assessment in 2016 were that the site is available and development is achievable subject to detailed highway assessment. Given this supportive policy background, and in consultation with Council officers, Cheergrey began preparation of a further planning application for the site as a whole. This is to be a hybrid planning application, comprising a detailed planning application for a hotel and conference centre and an outline application for business uses and ancillary mixed uses on the remainder of the site. The proposed hotel would contain 250 bedrooms and include retail areas, a sports clinic and fitness suite. The proposed conference centre would be capable of accommodating 500 to 1000 people and it is envisaged that this could be used to host events, such as sporting events like badminton tournaments, or chess tournaments as well as conferences. In March 2016 WSP, on behalf of Cheergrey, outlined the scope of this planning application and requested an EIA Scoping Opinion. The Council responded in June 2016 indicating the scope of the required EIA (reference UTT/16/0709/SO). There was no further communication from the Council until the current draft Local Plan was published which failed to re-allocate the site. Since 2012 therefore there has been consistent policy support from the Council for the development of the site as a whole, both in the context of the various iterations of the draft Local Plan and in discussions with Cheergrey regarding a further planning application. Based on this engagement, Cheergrey has had a legitimate expectation that the whole site would be allocated for employment uses and has invested considerable resources in providing the infrastructure for growth and in undertaking work towards a planning application and EIA. This is now at risk since the Council has, very belatedly, appears to change its position, despite the very positive engagement it has had with Cheergrey over several years. Inconsistency with evidence base The evidence base for the current draft Local Plan strongly supports the allocation of further land at City Meadows, Elsenham. Firstly the draft Plan itself states in para. 5.31 that Planning permission has recently been granted for a substantial B1 (a) office development next to the established industrial estate in this location (Trisail Towers). This prestigious office development has the potential to bring substantial economic benefits and is likely to attract further investment. The current draft Local Plan is also linked to an Economic Development Strategy for 2016-18 which includes the following aims for the district: Promote specific and targeted propositions to attract inward investment and facilitate local business expansion Year on year increase in the number of people visiting Uttlesford Cheergrey is an established local business with plans for expansion and a successful track record of delivering inward investment in the Water Circle and at TriSail. Moreover, Cheergrey has now attracted the interest of a well-respected hotel operator in developing a hotel/conference facility so it is clear that both of these aims from the Economic Development Strategy would be achieved by retaining the

allocation at City Meadows, Elsenham. The detailed analysis on which the Plan's economic strategy is based is contained in the various employment land studies which the Council has commissioned over the years. Dating as far back as 2011, every one of these has recommended allocation of further land at City Meadows, Elsenham. The most recent of these is the Uttlesford District Employment Land Review Update (ELR), 2017 which is consistent with the earlier version of the ELR from 2016. Para. 8.2.1 of the 2017 ELR Update states The provision of larger office premises is limited, although recent developments such as at Parsonage Road Business Centre (C31) and Gaunt's End Industrial Estate (C5) are well occupied and indicate a demand for new office floorspace within the District. Developments such as TriSail Towers which is currently 40% pre-let also points towards a sustained demand for new high grade office floorspace, particularly within the south of the District in proximity to Stansted Airport. Para.8.2.4 states Access to strategic road networks and proximity to Stansted Airport within the south of the District indicates that this area is most likely to capture commercial interest in Uttlesford's office market. It will be important, in order to meet this requirement, that the District is able to safeguard and encourage a wide range of premises that cater for the varying types of existing and emerging demand. Para. 8.2.8 states there are a number of strategic development sites within proximity of Stansted Airport which could meet requirements for larger, Grade A office stock. These sites could provide opportunities for existing medium and large office occupiers within the District to grow as well as attracting inward investment from occupiers looking to capitalise on the strategic road connections within the south of the District. Consequently in section 8.3.3 the ELR recommends the allocation of B1 a/b Use Classes on Land at Gaunt's End / Elsenham Meadows (Call for sites 01Els15 and 10Els15). It states that The provision of new office space should complement existing provision and help to support and encourage a range of businesses to grow and invest within Uttlesford from start-up, micro, small to medium sized enterprises as well as larger businesses, should interest be received. The justification given for this in para. 8.3.7 is that Land north east of Elsenham (Call for sites 05Els15, 06Els15 and 07Els15) which forms part of a larger strategic mixed use proposal which could accommodate new B1 floorspace within a highly accessible location in an area of new residential growth Recommendation R4 relates to B1c, B2 and B8 Use Classes and states that the Council should support the development of employment clusters which are currently functioning well as employment locations but which have vacant land, land with derelict buildings or have underutilised land and premises. These locations could include C5 Gaunt's End Industrial Estate. Note these references are to City Meadows, Elsenham despite the confusing nomenclature used. Retention of the allocation of further employment land at City Meadows, Elsenham would therefore be consistent with every Employment Land Review which has been undertaken on behalf of the Council since 2011, with the conclusions of the Inspector who examined the 2014 Local Plan and with the Council's own Economic Development Strategy. Para. 5.4 of the current draft Local Plan states that The policies in the Local Plan have had full regard to the Employment Land Review Update 2017, yet this is clearly not the case. The failure of the Plan to re-allocate the City Meadows, Elsenham site is inconsistent with the Council's own evidence base on which the Plan is supposed to be based. Flawed methodology in the Plan The failure to allocate the site as a whole for employment uses seems to be based on a numeric projection the Council has undertaken of future employment need which quantifies future office space demand as some 21,000 sq.m. However, this whole approach is flawed and fails to understand the opportunity and locational advantages presented by high quality sites such as City Meadows, Elsenham which are close to London Stansted Airport and with good strategic accessibility. The ELR has highlighted the poor quality of much of the office stock in Uttlesford, that the office market is under-represented compared with the rest of the region and that there are high levels of out-commuting. The Plan forecast of future employment needs is based on the medium growth scenario from the ELR which is based on the historic share of regional employment which Uttlesford has provided (current draft Local Plan para. 5.11). This trend based projection seriously underestimates the true potential for future growth since it is based on an existing baseline which is so low. This approach would merely perpetuate the existing unsatisfactory position and lacks ambition. There is no recognition in the Plan of the potential to create any new demand which would diversify the existing employment base. Cheergrey has demonstrated with the

Water Circle and TriSail that it is possible to stimulate new demand in the right location and with high architectural and environmental standards. This type of 21st century, mixed use business cluster is not fully factored into the Plan projection, which is based on the current poor quality office product in the District. This means that it is highly likely that the Plan will fail to achieve the important objective which is clearly stated in the Economic Development Strategy to attract inward investment and facilitate local business expansion. Opportunity for Inward Investment Cheergrey has demonstrated with the Water Circle and TriSail development that there is a demand for high quality office space set in an attractive, mixed use business location and has been able to create a demand and a new product which does not exist elsewhere in the District. The Plan takes no account of this type of commercially driven demand. The proximity to the M11/A120 corridor and London Stansted Airport is a major benefit of this location, since Stansted is a core public transport hub with excellent connections by road, rail, air and bus services. This location is particularly attractive to larger, high value businesses, serving a regional or national market, that want to expand their operations or move away from central London and international businesses, attracted by the proximity to London Stansted airport. This is demonstrated by the fact that two new tenants have located at the Water Circle Building in anticipation of moving to TriSail once completed; namely Swedish medical IT innovator Sectra which has established its new UK headquarters at Elsenham and Fortis, which is part of the CF Capital Group. The Estate has space to grow to provide further high quality, modern accommodation in an attractive location, and the available land is in the ownership of an established developer with a proven track record of delivery. All these factors are likely to prove highly attractive to the market and will ensure a successful development which will help to transform perceptions of the employment market in Uttlesford. The Plan also fails to address the need identified in the Economic Development Strategy to increase the number of people visiting Uttlesford. Tourism development is dealt with in the Plan as a sub-set of retail development and the only policy dealing with it is policy RET3 which expresses support for tourism functions within town and local centres. Surprisingly, given the economic potential, there is no explicit policy dealing with tourism accommodation. Cheergrey has identified a need and opportunity to provide a high quality business hotel, linked to the accessibility provided by the transport hub at London Stansted Airport and has an initial agreement with an International Hotel Operator to operate a five star hotel & conference centre at Elsenham Meadows. These proposals are being developed as part of our forthcoming planning application for the site as a whole and would provide a major stimulus to the tourism sector in Uttlesford. The Cheergrey Vision for City Meadows, Elsenham The site has an established history of employment activities which extends back at least as far as the 1960s. Planning permission was granted on 9th January 1969 for the extension of the jam factory (ref SWR/0255/68). Planning applications securing ongoing enhancement of the Elsenham Estate over time have included the provision of a new entrance road and access infrastructure (approved on 16th October 1985, ref UTT/0988/85). Most recently, a series of major planning approvals have enhanced and expanded commercial operations on the Estate. On 23rd December 2002, planning permission was granted for the Water Circle development, comprising the erection of a building to house a water bottling plant, offices and the creation of new access and parking provision (ref UTT/1184/02/FUL). On 24th May 2006, planning permission was granted for the erection of the second storey office extension to the Molton Brown building (ref UTT/0546/06/FUL). In April 2012 planning permission was granted for TriSail comprising 6,978 sq.m. of offices and 1,396 sq.m. of ancillary mixed retail, cafe/restaurant and health spa facilities, together with underground parking, landscaping and ancillary works (ref UTT/1473/11/FUL). Currently the site is home to a mix of manufacturing, research, offices and development uses, including Elsenham Water Ltd, Cheergrey Properties, ABF/Elsenham Quality Foods Ltd, IT company Hytek, Molton Brown/KAO, Swedish medical IT innovator Sectra and Fortis, which is part of the CF Capital Group. These businesses are all thriving and contributing to the local economy. Currently the site provides employment for some 500 local people. The TriSail development is seen as the first phase of the development of the overall Masterplan for the site, originally submitted to the Council in 2011. TriSail will comprise modern, high-quality business space of exceptional design quality. The design is of an iconic and visually outstanding quality, comprising three inter-connected buildings, linked by interconnecting sky bridges, with an oval

footprint. The buildings are 7, 6 and 5 storeys respectively with associated parking to the north of the site in an underground structure with a landscaped roof. The elevations of the buildings are characterised by tilted and curved elevational forms and extensive use of glazed finishes. The buildings are set within an area of lowered ground, which would help to blend the buildings into the wider landscape and make efficient use of the land. Figure 3 TriSail Towers TriSail Towers inspired by billowing sails, iconic design that offers a new Financial and Commercial Centre / district for London Stansted. The existing Estate has been developed in a sustainable manner with a series of unique, high quality designs. The new development of TriSail is being planned to meet BREEAM excellent standards with on-site renewable energy and grey water systems. The site as a whole incorporates generous landscape bunds and planting and a range of outside amenities including wild flower meadows, jogging trails, picnic and recreation areas. A new roundabout junction and access road has been constructed as part of the TriSail development and public transport services are being enhanced with a dedicated public transport connection to London Stansted Airport. This also has sufficient capacity for the first phase of the new development. For subsequent phases there are opportunities to develop a new access road to the M11, in conjunction with London Stansted Airport and an adjacent landowner, which are being actively pursued. Cheergrey's vision for the site as a whole is to create a mixed use, high quality business location, building on the high architectural and environmental standards which have been established with the Water Circle and TriSail. This vision was summarised in the scope of the hybrid planning application which was outlined to the Council in the EIA scoping request in 2016. This indicated the following areas for the site as a whole Total site area 19ha Existing developed area 4.26ha Future development area 10.51ha Landscape and open space 4.23ha. The plots for future development consist of 5 parcels of land and have already been laid out in outline form. These are summarised below and shown on Figure 4.

Plot	Application Type	Area (sqm)
Plot 2a	detailed application	13,652
Plot 2b	detailed application	13,119
Plot 2c	outline application	14,059
Plot 3a	outline application	12,277
Plot 4a	outline application	9,213
Plot 4b	outline application	12,602

Figure 4 Future Development Plots at City Meadows, Elsenham. It is the intention to develop the detailed scope of the outline elements of the development in the context of the EIA and in discussion with the Council. The proposed mixed uses are a key aspect of the vision for the site. This is necessary if this site is to meet its full potential as an employment location since ancillary mixed uses are an essential requirement for high-end, demanding business users these days such as gyms, retail and restaurant facilities. In this location too our market intelligence suggests that, as well as a high quality hotel and Conference Centre, there would be a strong demand for an element of serviced accommodation for short term rentals, which would be managed as part of the hotel. This would reinforce the attractiveness of this site, and Uttlesford District, as a business location and destination. The profile of firms likely to move to the site are expected to be mostly larger, high-value firms from the sector that will benefit from the site's strategic accessibility. Key sectors include: Financial and Business Services Consumer Goods Media and Entertainment (including hotel/conference facilities) Professional Support services (Consulting and Public Sector) Computing and Communication We plan to demonstrate this shortly as we build out the TriSail development and bring new, high quality, employers to the District. This is a large, attractive site, in the ownership of an established developer situated within the M11/A120 corridor and close to London Stansted Airport, a major transport hub. The site is capable of becoming a significant employment cluster and can be brought forward for delivery during the Plan period. The further allocation of employment land at City Meadows, Elsenham would be of strategic significance to the District in helping to further diversify Uttlesford's business base, by attracting inward investment, particularly from international businesses and regional corporate headquarters and back-office facilities. The proposed allocation site is adjacent to existing businesses at Elsenham and a safeguarded employment site and is the next logical phase in the development of the overall Estate. The land is in the single ownership of an established developer with a proven record of delivery. Many other employment sites within the District are either poorly located, in historic settlements or in unsuitable buildings which do not meet modern requirements. The proposals offer an opportunity to create a cluster of business and employment activities which will set a new benchmark for the

District. Uttlesford residents have high levels of skills and qualifications which will enable them to take advantage of the new employment opportunities to be created, thereby reducing levels of out-commuting which are currently at unsustainable levels. A cluster of mixed use, employment development here would create a new economic centre in the south of the District, that will complement the science and research activities provided at Chesterford Research Park. Summary Cheergrey objects to the latest proposals for their site at City Meadows, Elsenham in the current draft Local Plan, which only identifies a small part of the overall site as an employment site rather than the site as a whole which was shown in previous versions of the Plan. Change of Policy. Throughout the long period of Plan preparation the Council has been supportive of Cheergrey's plans for further development of the wider site until, without explanation or justification, the current draft Local Plan fails to allocate the site for development, despite being endorsed by the Council in the local Plan process in 2012, 2014, 2015 and 2016. We are at an advanced stage in the process of preparing a planning application and EIA for further development and the recent apparent change of policy has created uncertainty and confusion, which needs to be rectified. Inconsistency with evidence base. There are numerous references in the Plan itself and the Council's own Economic Development Strategy which support further development including references to Trisail as a prestigious office development which is likely to attract further investment. In addition, every Employment Land Review which has been undertaken on behalf of the Council since 2011 has recommended allocation of further land at City Meadows, Elsenham. Moreover, the Inspector who examined the 2014 Local Plan (which allocated the site) found the employment aspects of the Plan to be sound. Flawed methodology in the Plan. The Plan forecast of future employment needs is based on the historic share of regional employment which Uttlesford has provided. This trend based projection seriously underestimates the true potential for future growth since it is based on an existing baseline which is very low. This approach lacks ambition and does not recognise the potential of City Meadows, Elsenham to attract inward investment and stimulate and diversify the current employment base. Opportunity for Inward Investment. Cheergrey has demonstrated with the Water Circle and TriSail development that there is an opportunity to attract significant inward investment to the District with high quality, flexible office space set in an attractive, mixed use business location. The proximity to the M11/A120 corridor and London Stansted Airport is a major benefit of this location, since Stansted is a core public transport hub with excellent connections by road, rail, air and bus services. Cheergrey Vision for City Meadows, Elsenham. Cheergrey's vision for the site as a whole is to create a mixed use, high quality business location, building on the high architectural and environmental standards which have been established with the Water Circle and TriSail. This is a large, attractive site, in the ownership of an established developer. This location is particularly attractive to larger, high value businesses, serving a regional or national market, that want to expand their operations or move away from central London and international businesses, attracted by the proximity to London Stansted airport. The further allocation of employment land at City Meadows, Elsenham would be of strategic significance to the District in helping to further diversify Uttlesford's business base. In conclusion we object to the current version of the draft Local Plan and urge the Council to reinstate the allocation of our land at City Meadows, Elsenham (Figures 1 and 2) in accordance with the evidence base and with our legitimate expectations. We note that the Plan is draft form and that in the publicity surrounding the launch of this consultation the Council has pledged to make any necessary changes to the draft Local Plan before it goes out to public consultation again early in 2018 (Uttlesford life summer 2017). Councillor Rolfe, the Leader of Council has stated that Officers have looked very carefully at all the options and alternatives, and have made their recommendations based on planning evidence. This is not the final draft of the plan, but a set of recommendations. Getting the public's constructive feedback will be a key part of the process as we continue to shape the Plan. We urge you to consider this representation in this light and to respond positively to our constructive feedback.

Individuals

- As Gaunts End is within the CPZ, there should be a stop on further development beyond that which has already been approved, particularly in view of the acute difficulties in road access as highlighted by two government inspectors.

Sustainability Appraisal June 2017

Not applicable

Start Hill, Great Hallingbury

Paragraph 5.32

This paragraph was responded to by one organisation.

Support	0
Object	1
Comment	0

Overarching Summary

- Given that Start Hill has now been fully developed, the ‘Vision Stansted’ site (Land west of Bedlar’s Green, Great Hallingbury) should be allocated for employment purposes.

Statutory consultees and other bodies

None

Developers/landowners/site promoters

Paragraph 5.32 this is the Vision Stansted site, which is now fully developed and occupied. This site was put forward in a similar way to the respondents site in representations made to the draft Plan in 2012. It was subsequently allocated, an application made for its development, approval granted, the development was started immediately. The site is now fully built out and occupied by businesses that have moved into the area. Better than anything else perhaps, Vision Stansted provides evidence of demand from outside the District, it also demonstrates the popularity of the location and its proximity to J8 of the M11. The respondents and their advisors are supremely confident that an allocation on the respondents site would prove equally successful, not least because there are no similar sites that are available in the District, which are available now, in the right condition and location. The ELR makes the very point in its para 9.3.19, which states: Start Hill south of the B1256 adjacent to the Stansted Distribution Centre, Start Hill in particular offers a strategic location within close proximity to both Stansted Airport and Junction 8 of the M11 which would be very attractive to potential warehouse and distribution occupiers.□ The statement above exactly mirrors the attributes of the respondents site at Start Hill. There is no capacity available at the Stansted Distribution Centre or at Vision Stansted, therefore an additional site is needed now to meet this requirement.

Individuals

No individual response

Sustainability Appraisal June 2017

Not applicable

Proposed Sites for Additional Employment Allocations

Paragraph 5.34

This paragraph was responded to by one individual.

Support	0
Object	1
Comment	0

Overarching Summary

- There has been no consideration of employment opportunities at all in Thaxted e.g. retail, office.

Individuals

There seems to be no consideration of employment opportunities at all in Thaxted, e.g. retail, office.

Sustainability Appraisal June 2017

Not applicable

Garden Communities

Paragraph 5.35

This paragraph was responded to by two individuals and one organisation.

Support	0
Object	2
Comment	1

Overarching Summary

- Paragraph seems to re-interpret and understand Garden Community Principle 5 (GCP5) as stated in Appendix 5. Paragraph 5.35 should be closer intertwined with GCP5 should have a clear objective to meet GCP5, reducing the need to travel and provide no less than one job per household;
- Unlikely that genuine employment will materialise in developer-led artificial settlement as suggested;
- Delivery of employment will be long after delivery of housing and infrastructure.
- Nature of employment development will be small scale and largely retail/ service sector related. Are employment requirements now which are not been met due to lack of supply of available land.

Statutory consultees and other bodies

None

Developers/landowners/site promoters

- Paragraph 5.35 from our experience and a review of these plans, the delivery of any employment will be long after delivery of the housing and infrastructure. The nature of this sort of site is that the employment development will be small scale and largely retail/service sector related. The potential for these sites to come forward and make a meaningful contribution to the requirements in the plan period is considered to be very low. It is also the case that the delivery overall of the Garden Communities is

somewhat uncertain, there are employment requirements in the District now, which are not being met due to the lack of supply of available land.

Individuals

- It is unlikely that genuine employment will materialise in Developer-led artificial settlements suggested.
- This seems to re-interpret and understate GC principle 5 as stated in Appendix 5. UDC and GC developers should have a clear objective to meet that principle, reducing the need to travel and providing no less than one job per new household within the new community.

Sustainability Appraisal June 2017

Not applicable

London Stansted Airport (Northern Ancillary Area)

Paragraph 5.36

This paragraph was responded to by one organisation.

Support	0
Object	1
Comment	0

Overarching Summary

- The Northern Ancillary Area site is subject to a number of constraints both physical, legal and in terms of servicing and access;
- These issues mean that securing land for employment development is very difficult in the short to medium term;
- Understood a significant area of this site is soon to be the subject to a planning application for a large single user; will significantly reduce the availability of land for localised SME led demand in this area.
- Any supply is subject to the operational needs of the airport operator, who is currently consulting on further expansion of the airport, which will inevitably have an impact on the appetite for non-core activities and puts a further question mark over the reliance on this site, as providing a supply of readily available land to meet the local and migratory needs of businesses.

Statutory consultees and other bodies

None

Developers/landowners/site promoters

Paragraph 5.36 The London Stansted Airport (Northern Ancillary Area) site is subject to a number of constraints both physical, legal and in terms of servicing and access. These issues mean that securing land for employment development here is very difficult in the short to medium term. It is understood that a significant area of this site is very soon to be the subject to a planning application for a large single user, which will significantly reduce the availability of land here for localised SME led demand in this area. There are also issues and concerns associated with the allocation of future employment land provision on a site, which is monopolised by Manchester Airport Group. Any supply is subject to the operational needs of the airport operator, who is currently consulting on further expansion of the airport, which will inevitably have an impact on the appetite for non-core activities and puts a further question mark over the reliance on this site, as providing a supply of readily available land to meet the local and migratory needs of businesses.

Individuals

None

Sustainability Appraisal June 2017

Not applicable

Chesterford Research Park

Paragraph 5.37

This paragraph was responded to by five individuals.

Support	0
Object	5
Comment	0

Overarching Summary

- There is a conflict of interest with Uttlesford District Council having purchased a 50% share of the holding of the site and the site has subsequently been allocated as an employment site.

Statutory consultees and other bodies

None

Developers/landowners/site promoters

None

Individuals

- Conflict of Interest “ Uttlesford District Council has recently bought a substantial holding in the Chesterford Research Park. The draft Local Plan states that the North Uttlesford Garden Community should maximise economic links with Chesterford Research Park. There appears to be a conflict of interest here as UDC is the part owner and planning authority for both the new settlement and the Research Park. This raises the question of whether the new settlement's location or the rationale for the existence is based on objective evidence, particularly given the inclusion of this proposed settlement in the local Plan has only been made at the last minute and immediately following UDC's investment.
- Does not Uttlesford District Council have a conflict of interest following their substantial holding in Chesterford Research Park?
- The UDC website states council purchased a 50% interest in Chesterford Research Park in May 2017. This creates a conflict of interest between their role as owners/developers of the Park and their role as a planning authority. Before their purchase of the site there appears to have been no interest in large scale residential development in the north of the district as evidenced by the minutes of the meeting held with South Cambs on 17th January 2017, however, the enthusiasm for developing North Uttlesford Garden Village appears to date from this purchase indicating that it is motivated more by financial gain for the Council than by planning principles.
- This highlights the conflict of interest for UDC in owning part of Chesterford Research Park. It is being used to justify the proposal for NUGV.

Sustainability Appraisal June 2017

Not applicable

Training

Paragraph 5.39

This paragraph was responded to by one organisation.

Support	0
Object	0
Comment	1

Overarching Summary

- Local Plan does not mention proposed further education college/a new site for Harlow College at Stansted Airport. This is an essential vocational college, in particular to meet the needs of the airport area that will offer courses from engineering to customer service.

Statutory consultees and other bodies

Uttlesford Futures (Employment, Economy, Skills, Environment and Transport) - The Local Plan does not mention the proposed further education college/a new site for Harlow College at Stansted Airport. This is an essential vocational college, in particular to meet the needs of the airport area that will offer courses from engineering to customer service. Vocational educational links are already under discussion with the college by Uttlesford secondary schools. There is limited Adult/Life Long Learning in Uttlesford, but this is caused by overall high level of employment and low unemployment. The Airport also has an Academy to assist adults to gain work experience, train and obtain work at the airport. Getting to the airport is assisted with travel passes. The Aerozone is an airport facility for schools which provides insight into the history, jobs at the airport and importance of Science, Maths and Engineering.

Developers/landowners/site promoters

None

Individuals

None

Sustainability Appraisal June 2017

Not applicable

Electronic Infrastructure

Paragraph 5.40

This paragraph was responded to by one organisation.

Support	0
Object	1
Comment	0

Overarching Summary

- Although the Plan refers to the need for broadband to be improved, it is not ambitious enough.
- The stated target of 10Mb/s is the minimum that a modern family home needs today. This will be totally inadequate to in the future, for either domestic needs as broadcast TV gives way to on demand streamed services and home working becomes more common.
- The target should be at least 100Mb/s with technology that can be upgraded to 1GB/s as needed.
- Technologies exist to deliver these speeds in dispersed rural areas without the limitations of radio and satellite referred to and should be implemented quickly to maintain the competitiveness of the District.

Statutory consultees and other bodies

Littlebury Parish Council - Although the Plan refers to the need for broadband to be improved, it is not ambitious enough. As we move from traditional industries to a knowledge-based economy, with more working from home, world class broadband will be needed to attract and retain companies. Every premise needs high speed internet connectivity. The stated target of 10Mb/s is the minimum that a modern family home needs today. This will be totally inadequate to in the future, for either domestic needs as broadcast TV gives way to on demand streamed services and home working becomes more common. The target should be at least 100Mb/s with technology that can be upgraded to 1GB/s as needed. This is the standard to be trialled in six pilot areas (announced by government last week), and is highly likely to be the expected norm nationally. All properties in the garden villages and new developments elsewhere should be fibre enabled from Day 1. Technologies exist to deliver these speeds in dispersed rural areas without the limitations of radio and satellite referred to in the draft plan and should be implemented quickly to maintain the competitiveness of the District.

Developers/landowners/site promoters

None

Individuals

None

Sustainability Appraisal June 2017

Not applicable

Tourism

Paragraph 5.45

This paragraph was responded to by one organisation and one individual.

Support	1
Object	1
Comment	0

Overarching Summary

- The reference to the role that built heritage has to play in the tourism industry, this is welcomed;
- Tourism seems an obvious area of major employment potential that is neglected in this plan. What about provision for increased tourist accommodation? Support for local tourist, catering and entertainment industries?

Statutory consultees and other bodies

Historic England - The reference to the role that built heritage has to play in the tourism industry, this is welcomed.

Developers/landowners/site promoters

None

Individuals

Tourism seems an obvious area of major employment potential that is seriously neglected in this plan. What about provision for increased hotel, B&B and other tourist accommodation? Support for local tourist, catering and entertainment industries? The countryside is a major attraction - capitalise on this, rather than building on the fields these unwanted new communities?

Sustainability Appraisal June 2017

Not applicable

Employment Strategy

Policy EMP1

This policy was responded to by 27 people/organisations.

Support	6
Object	12
Comment	9

Overarching Summary

- Suggestion that larger business sites include space for 'incubator/new businesses'.
- We should be about proactively encouraging employment opportunities in the Garden Communities, not just supporting.
- There is no provision for new employment land outside of the Garden Communities and Stansted.
- We should explicitly support the intensification/ expansion of the Principal Employment Areas.
- The wording of EMP1 is excessively restrictive with regard to supporting (non B-class) uses.
- Concern related to permitting non airport related uses on 43 ha of land at Bury Lodge Lane. Lifting the airport restriction could have consequences for accommodating airport related growth in the future.
- Additional land should be allocated adjacent to existing employment sites in the Green Belt to allow expansion. With no provision to allow the expansion/ growth of new/ existing business and employment sites, existing firms won't be able to expand their current premises, so will need to relocate.
- We should place greater emphasis on supporting high-tech industries.
- We should support its Chesterford Research Park's further expansion to assist meeting the overall employment need.
- We should add greater focus and measures to specifically support the construction industry.

Statutory consultees and other bodies

Saffron Walden Neighbourhood Plan and Stansted Neighbourhood Plan - Prioritises employment at Stansted Airport. If houses are to be built in Saffron Walden on any scale then more effort should be made to ensure that communities are sustainable and ensure that new housing is matched by new offices etc. Otherwise, the town risks becoming no more than a commuter town for London and Cambridge.

Suggestion: Need to mention high-tech industries requiring good accessibility (digital as well as vehicular).
Need to mention high tech industry requiring office standard manufacturing space.

Prioritises employment at Stansted Airport. Suggestion: Need to mention high-tech industries requiring good accessibility (digital as well as vehicular). Need to mention high tech industry requiring office standard manufacturing space.

Saffron Walden Town Council - If houses are to be built in Saffron Walden on any scale then these communities should be sustainable with provision of new offices and other places of work, otherwise the town risks becoming no more than a commuter town for London and Cambridge. Proposed. Need also to mention the importance of high-tech industries requiring good communications (digital and transport). Needs standard office/manufacturing space.

Essex County Council - Preamble to Policy EMP1 (page 67, 79) Policy EMP1 ECC recommends that UDC recognise waste development as an employment use and that this should be set out within the supporting text introducing Policy EMP1 (paragraphs 5.24, 5.45). Although sui generis waste uses often share characteristics of light or general industrial development including warehousing, ECC recommends that Policy EMP1 include sui generis as part of the use classes listed in the policy under bullet 4 to reflect the requirements of the adopted Essex and Southend-on-Sea Waste Local Plan. Policy EMP1 (& paragraph 5.3) Employment Strategy. Also supports Section 8, in particular social infrastructure, supporting employment (5) growth (NB Linked to Sections 4 (para. 4.28) and Section 9 on housing and design, Inc. Policy H8 in particular references to CLTs and self-build homes) Garden Communities As noted under Policy SP5, ECC would urge the preparation of an economic strategy for each of the Garden Communities. The Garden Communities should be as much about employment as they are about housing; not just quantity but the quality of employment with the Garden Communities, which can provide a real opportunity for economic aspiration. Such a strategy should also ensure that the existing businesses in the area are encouraged to grow through the opportunities that Garden Communities and the enhanced infrastructure present to them. The economic strategy should identify the ways in which the public sector bodies can begin to assist these businesses with their growth and preparing them to take advantage of the opportunities through, for example, bids for business support funding to European Regional Development Fund (ERDF) or other similar such funds now and in the future. NEGC commissioned SQW and Cambridge Econometrics to carry out a North Essex Garden Communities Employment and Demographic Study. The purpose of this commission was to understand the likely future demographic patterns of the Garden Communities to ensure the appropriate provision for services is made and to develop quantified scenarios for future employment growth to inform (but not come up with) job creation targets. UDC should refer to this study and may seek to commission something similar for its evidence base to inform and aid delivery. Skills ECC notes that Section 5 (Employment) refers to UDC's Economic Development Strategy (2016-18) and its links to the Local Plan. ECC would wish to see greater focus and measures to specifically support the construction industry. The Essex Employment and Skills Board (ESB), Evidence Base District Profile 2017-18 highlights that Uttlesford has 925 construction enterprises, which has grown year-on-year from 2013 (by 145 enterprises). Across Greater Essex to meet demand, based on ESB/Construction Industry Training Board (CITB) research, there is a need to grow the workforce of this sector by between 12,000 and 24,000 people by 2021. Accordingly, ECC wishes to help ensure that consideration is given to support effective implementation and delivery of the UDC Local Plan through promoting and enabling the employment opportunities in this sector, partly in order to help provide the significant volume of new homes proposed (14,100). In particular this needs to have regard to developer responsibilities within planning, to stimulate new and local employment opportunities through Apprenticeships. With 925 construction enterprises, employing over 3,000 people in the district, there is a need for wider consideration to be given in terms of supporting local employment growth, by seeking local sub-contracting arrangements with developers. ECC supports that the Draft Local Plan seeks well-designed new developments, which in particular raises the standard of design locally and in turn introduces innovative building techniques. ECC is mindful that there is a lack of Further Education provision in the district and neighbouring districts of training in modern methods of construction has implications for house design and urban regeneration. ECC considers that by seeking developer contributions, UDC could support the provision of new courses in neighbouring districts/boroughs

where there is capacity to deliver such innovative training. This would continue to support the skills infrastructure and provide relevant skills (both adult and young people) needed for a modernising sector. ECC welcomes ongoing engagement with UDC on the above matters. It is noted that the skills shortage in construction and the development rates expected within the district is not just an UDC matter, it is experienced across Essex. ECC is therefore working with key stakeholders to address the issue, to assist in the future development and economic growth across Essex. Paragraphs 5.4, 5.45 and Policy EMP1 Employment Strategy (page 76) Grow on Space ECC supports the statement that UDC will support the provision of small scale office units to accommodate the needs of small sized businesses. However, it is recommended that the Local Plan supporting text in Section 5 includes reference to Grow on Space, and that Policy EMP1 also seeks to promote and facilitate the delivery of Grow on Space. It is important to note that other Essex Local Planning Authorities including Colchester, Braintree and Tendring emerging Local Plans include reference to Grow on Space. Recommended wording is provided below. ECC commissioned a Grow on Space Feasibility Study which found that across the county there was approximately 1 year's-worth of Industrial Grow On Space and 2.5 years worth of Office Grow On Space (which for the purposes of the study was defined as commercial workspace of between 100 and 300 sq.m). The study concluded that within UDC from July 2016 and the previous 3 years, take up of Grow on Space, versus the then availability, demonstrated that the level of available Grow On Space (across office and industrial uses) was only 1.5 years. The Essex Economic Commission also identified an inadequate supply of flexible tenures (e.g. Grow-on Space), which is holding back successful businesses that want to expand and grow. The Council will consider which interventions are the most appropriate and viable to ensure the provision of flexible local employment space (by tenure) in the plan area. The following amendment is recommended for the 9th bullet point in Policy EMP1: The Council will support the provision of small scale office units to accommodate the needs of small sized businesses including grow on space . Early Years and Childcare

It is recommended that Policy EMP1 facilitates the provision of Early Years and Childcare facilities within employment areas to reduce the need to travel and provide such facilities close to people's place of employment. Sustainable Transport ECC notes that Section 5 Employment avoids any comment about employment sites being accessible by any means of transport. It is welcomed that this policy highlights the inter-relationships and sustainable transportation links between key employment zones throughout UDC. Further discussions with ECC are welcomed to ensure that the policy wording adequately reflects the aspirations of the Transportation Authority.

Natural England - Natural England recognises the strategic importance of Stansted Airport to the local area. However it is important that existing and future proposals for expansion are properly assessed for impacts on the environment, in particular on nearby Hatfield Forest SSSI. Natural England welcomes the 4th criteria for assessment of proposals but would like to see specific mention of safeguarding and enhancing the SSSI within the policy.

Developers/landowners/site promoters

- When larger business sites are planned we suggest that there be space for 'incubator/new businesses' and then close sites for expansion and development. Information on economic growth/business development to be made available to educators in order to ensure that curriculum can take into account what skills are needed in industry (in addition to general employability) and in order to foster school/college industry links. Business development in the plan is around the science sites, Stansted Airport and A120. Is this sufficient if the aim is to develop local industry and achieve local employment to negate travelling longer distances to work? Industrial development in agricultural buildings, areas west of Saffron Walden. People often talk about most of the jobs at the airport being 'lower paid'. This is true for the starter posts, but there is evidence that once at the airport and having gained experience they progress to higher paid posts - there is a career ladder.
- Support for policy EMP1 and paragraph 5.35, which confirms that the new Garden Communities will each deliver a range of B use class employment opportunities on site. The exact scale and

nature the employment opportunities to be provided at the West of Braintree Garden Community will need to be assessed and determined through a more detailed level of master planning, via a Supplementary Planning Document, or similar. The development vision and master plan prepared by GL Hearn and submitted towards the previous Uttlesford and Braintree call for sites and Local Plan consultations identified provision for up to 10.43 hectares of employment development across the proposed Andrewsfield Garden Village. The master plan provided for two employment parks (one located next to an existing employment use), as well as a range of employment opportunities at district centres, retail and leisure uses as well as at community and educational uses. Existing employment uses within the WBGC site will also provide employment opportunities to future residents within the WBGC.

- As we have previously observed, outside of potential localised employment within the new garden villages and specific allocation at Stansted Airport, there is no provision for new employment land, and we are experiencing on a daily basis a significant shortage of supply relative to demand for such accommodation. It is clearly a significant step towards sustainability to be able to provide accommodation for employment purposes close to population centres such as Dunmow, Takeley and, of course, Bishop's Stortford, and it seems that whilst laudable for the Council's stated policy to provide and accommodate new employment opportunities, this will not be achieved by the specific details of the policy set out in this section.
- These representations are submitted on behalf of Jackson Management, the owner of Thremhall Park Business Centre. We support the allocation of Thremhall Park as a Principal Employment Area as set out at appendix 6 of the draft Plan. However, we have two concerns with regard to the wording of policy EMP1:- EMP1 does not explicitly support the intensification/expansion of the Principal Employment Areas, contrary to the recommendations of the Employment Land Review Update 2017. The wording of EMP1 is excessively restrictive with regard to supporting uses. Intensification/Expansion of Principal Employment Areas Paragraph 5.4 of the draft Local Plan states that, The policies in the Local Plan have had full regard to the Employment land Review Update 2017. The ELR sets out recommendations regarding B1 a/b use classes at paragraph 8.3.3. Recommendation 1 states that, The demand assessment estimates that under the medium demand scenario, there will be a net additional requirement for 21,000sqm of B1 floorspace in Uttlesford District over the Local Plan period to 2033. In order to meet this demand requirement, the Council should support the provision and retention of existing B1 a/b use classes across the District and in addition promote the provision of new B1 a/b use class employment land and premises within suitable locations. These locations could include Thremhall Park, Start Hill (Call for sites 04GtHal15). Paragraph 5.24 of the draft plan notes that, There are a number of opportunities within existing employment sites within the district, either through intensification of uses or limited expansion of these sites. Whilst paragraph 5.25 recognises that sites have varying degrees of potential to redevelop or intensify, paragraph 5.26 sets out, Redevelopment and intensification for employment uses on site will be supported where the need can be demonstrated for their intensification and expansion It is clear that the intensification of a number of the Principal Employment Areas, including Thremhall Park, is a specific component of employment land supply during the Plan period. However, EMP1 merely states that in regard to the existing employment sites set out at in Appendix 6 ,The existing Principal Employment Areas set out in Appendix 6 as shown on the Policies Map shall be protected for B1, B2 or B8 uses. There is therefore no provision within the policy to provide support for intensification of use despite the recommendations of the ELR and the support for these recommendations within the supporting text of the draft Plan at paragraph 5.24, 5.26. We consider that as EMP1 is entitled Employment Strategy and lists new employment allocations including within the new Garden Settlements and within the Airport, the policy should also explicitly support the intensification of existing employment sites in line with the recommendations of the ELR. If the principle of expanding/intensifying all Principal Employment

Areas is not acceptable, the policy should list those where expansion/intensification is acceptable. The ELR is clear that intensification of existing sites is a key element of employment land supply in the district and this should be recognised in EMP1. We recognise that EMP2 provides further policy guidance with regard to the Principal Employment Areas, however we have concerns that this policy is unclear and excessively negative in its wording. Our concerns are detailed within our objection to this policy. Supporting Uses The fifth bullet point of EMP1 outlines that the Principal Employment Areas shall be protected for B1, 2 and 8 uses. We are concerned that this will constrain the creation of attractive and vibrant business park environments in employment areas such as Thremhall Park, by preventing supporting uses such as on-site cafes. Successful business parks such as Thremhall look to provide a range of facilities in order to attract occupiers. The recently consented (2016) scheme for the expansion of Thremhall includes the provision of a cafe, function room and gym, and future expansion may consider providing additional/amended facilities. Such supporting uses are particularly desirable at Thremhall as the focus is on the provision of serviced office space for small to medium sized businesses who would not be in a position to provide their own facilities, but would clearly benefit from being able to access such facilities. We would therefore suggest that the EMP1 is amended to allow the provision of supporting uses within the Principal Employment Areas.

- EMP1 Support. But effective broadband and allied technology improvements are overdue. Access to technology is critical to empowering a working rural population and encouraging employment. It may be counter intuitive but technology may be one of the critical saviours of a rural economy. In this the Society opposes all change of use to residential, in any form. Available commercial space encourages use.
- Comments Whilst we support the intention to accommodate new employment opportunities in the District, we do not consider that the policy approach as set out in Policy EMP1 is the most appropriate strategy, having regard to the reasonable alternatives. In summary, our concerns are: We object to the proposal to permit non airport related uses on 43 hectares of land north of Stansted airport which is contrary to the recommendations of the Employment Land Review Update 2017 (ELRU 2017). EMP1 does not explicitly support the intensification/expansion of the Principal Employment Areas, contrary to the recommendations of the Employment Land Review Update 2017. The wording of EMP1 is excessively restrictive with regard to supporting uses. Allocation of land north east of Bury Lodge Lane. We oppose the proposal to permit non airport related uses on 43 hectares of land north of Stansted airport; this site should be retained for airport uses only and alternative sites within the vicinity of the airport should be allocated. Allowing non-airport uses in order to make effective use of land is not the most appropriate policy approach in light of the reasonable alternatives. Lifting the airport restriction could have consequences for accommodating airport related growth in the future, should the dynamics of the airport change and space be required. The reasonable alternative of allocating additional employment land within the district, with ready access to the airport, is available and would be a more robust approach. Furthermore, the change of use of 43 hectares is not based on robust evidence. The ELRU 2017 supports the release of only 18 Hectares of land (as did earlier versions of the ELR), not the 43 hectares proposed. Save for these 18 hectares, the ELRU 2017 supports airport related development within the airport boundary in line with the Airport's Sustainable Development Plan (SDP) to enable and support future growth at Stansted Airport. Similarly, the Assessment of Land North East of Bury Lodge Lane 2012 recommends only the release of only 18 hectares. Notwithstanding our objection to the principle of the change of use of this land and the conflict with the evidence base, there is conflict within the policies in the consultation document itself as to the quantum of land to be allocated for non-airport related uses. Policy ED1 refers to 43 hectares, yet Policy SP11 - London Stansted Airport refers to the Northern Ancillary Area, describes it as a 55 hectare site to be allocated for B 2 and B8 Employment uses. The table and map in Chapter 13 Non-Residential Allocations refers to the

site area twice; once as 43 hectares and once as 55 hectares. The table refers to site specific policy SA1, however, there appears to be no such policy. Clarity is required regarding the size of the area proposed for allocation for non-airport related uses and policies to deliver it. Notwithstanding this, whether it be 43 hectares or 55 hectares, this is far in excess of the 18 hectares recommended by the ELRU 2017. Intensification/Expansion of Existing Employment Areas Policy ED1 only provides for the change of use or redevelopment of existing employment sites, but not intensification or extension, contrary to Policy ED2 which does refer to extension. This is contrary to the evidence base. Paragraph 5.4 of the draft Local Plan states that, the policies in the Local Plan have had full regard to the Employment Land Review Update 2017. The ELRU 2017 sets out recommendations regarding B1 a/b use classes at paragraph 8.3.3. Recommendation 1 states that, the demand assessment estimates that under the medium demand scenario, there will be a net additional requirement for 21,000sqm of B1 floorspace in Uttlesford District over the Local Plan period to 2033. In order to meet this demand requirement, the Council should support the provision and retention of existing B1 a/b use classes across the District and in addition promote the provision of new B1 a/b use class employment land and premises within suitable locations. Paragraph 5.24 of the draft plan notes that, there are a number of opportunities within existing employment sites within the district, either through intensification of uses or limited expansion of these sites Whilst paragraph 5.25 recognises that sites have varying degrees of potential to redevelop or intensify, paragraph 5.26 sets out, Redevelopment and intensification for employment uses on site will be supported where the need can be demonstrated for their intensification and expansion It is clear that the intensification of a number of the Principal Employment Areas, is a specific component of employment land supply during the Plan period. For sites within the Green Belt, additional land should be allocated adjacent to existing employment sites, to enable their expansion. With no provision to allow the expansion and growth of new and existing business and employment sites, existing firms will be unable to expand at their current premises, so will need to relocate. Relocation brings significant costs to the firm and could result in loss of firms from the District if suitable space is not available. Such a restriction on economic expansion would be contrary to Objective 2a of Chapter 2 of the consultation document. This aims to strengthen the local economy by enabling the growth of existing and new employers through the provision of suitable land and premises in sustainable locations to meet the anticipated needs and aspirations of businesses including providing opportunities for employment growth related to Stansted Airport. The 6th bullet point refers to displacement of existing businesses lost to other uses and states that the council will seek to mitigate any adverse effects. However, no provision is made to accommodate these displaced businesses. The policies maps identifying the existing employment sites show the boundaries tightly drawn so as to prevent expansion of existing businesses or provision of new employment floorspace at existing employment sites. Supporting Uses We object to the restriction to support of B Class uses only at the existing employment sites. This is considered to be in conflict with the National Planning Policy Framework (NPPF) which contains no such restrictions, being supportive of all sustainable economic growth uses. We are concerned that this will constrain the creation of attractive and vibrant business park environments in employment areas such as M11 Business Link, by preventing supporting uses such as on-site cafes. This element of the policy is in conflict with the policy support for both B Class and non-B Class employment uses at the new Garden Communities and also conflicts with Policy EMP2 which does allow some sui generis uses at existing employment sites. No explanation is given for this restriction to B Class uses only at existing employment sites. The evidence base underpinning this policy, the ELRU 2017, found that non-B use classes and sui-generis uses are not crowding out core industrial uses. We consider that non B Class employment uses should also be permitted at the existing employment locations in order to achieve the aim stated in the 5th bullet point of this policy to avoid loss of floorspace for economic development.

- Policy EMP 1 Employment Strategy and Policy EMP 2 Existing and Proposed Employment Areas. The respondents object to the Plan on the basis that it is not justified, in respect of making sufficient employment land provision. The respondent's own land at the junction of Bedlars Green Road, Dunmow Road and Start Hill, which was put forward as a proposed employment site as part of the Council's Call for site exercise in 2015. The site has not been proposed as an employment allocation in the Draft Plan, which the respondents believe is a missed opportunity, as the proposed allocations do not make adequate provision for the employment needs of the district. The respondents object to the Plan on the following basis :- Paragraph 5.4 - The ELR seems to be based upon a direct link between population growth and employment requirement - this takes no account of the expansion requirements of existing business or inward migration (e.g. from NE London or Harlow) of businesses looking to locate in the District. Local and highly respected commercial agents, Coke Gearing has advised the respondents that it is their experience through the many enquiries they receive that urgent provision of sites is needed now to meet a known demand. Paragraphs 5.11/12/13 - these seem to be broad assumptions without evidence? Paragraph 5.28 The respondents remind the Council that these sites have already been developed and are now occupied. Whilst the Council acknowledge that new employment land needs to be allocated for future demand, which has been calculated as 10.2 ha up to 2033, the current demand, which is significant, is not being met with a ready supply of good quality employment land, as a result, the Council is missing out on job creation opportunities. The draft plan makes provision for an additional 10.2 ha, which is to form part of allocations at existing sites at Chesterford Research Park and at London Stansted Airport (Northern Ancillary Area). In the case of the former, the site is not suitable for larger shed development, which is in demand now, and in the case of the latter, the availability of land here is subject to significant constraints, see Para 3.6 below. Paragraph 5.31 this site is poorly located in terms of transport (other than car) and is the wrong side of the airport- the development is stalled due to lack of occupier interest (it is not 40% pre let). Paragraph 5.32 this is the Vision Stansted site, which is now fully developed and occupied. This site was put forward in a similar way to the respondent's site in representations made to the draft Plan in 2012. It was subsequently allocated, an application made for its development, approval granted, the development was started immediately. The site is now fully built out and occupied by businesses that have moved into the area. Better than anything else perhaps, Vision Stansted provides evidence of demand from outside the District, it also demonstrates the popularity of the location and its proximity to J8 of the M11. The respondents and their advisors are supremely confident that an allocation on the respondent's site would prove equally successful, not least because there are no similar sites that are available in the District, which are available now, in the right condition and location. The ELR makes the very point in its para 9.3.19, which states: Start Hill south of the B1256 adjacent to the Stansted Distribution Centre, Start Hill in particular offers a strategic location within close proximity to both Stansted Airport and Junction 8 of the M11 which would be very attractive to potential warehouse and distribution occupiers The statement above exactly mirrors the attributes of the respondent's site at Start Hill. There is no capacity available at the Stansted Distribution Centre or at Vision Stansted, therefore an additional site is needed now to meet this requirement. Paragraph 5.35 from our experience and a review of these plans, the delivery of any employment will be long after delivery of the housing and infrastructure. The nature of this sort of site is that the employment development will be small scale and largely retail/service sector related. The potential for these sites to come forward and make a meaningful contribution to the requirements in the plan period is considered to be very low. It is also the case that the delivery overall of the Garden Communities is somewhat uncertain, there are employment requirements in the District now, which are not being met due to the lack of supply of available land. Paragraph 5.36 The London Stansted Airport (Northern Ancillary Area) site is subject to a number of constraints both physical, legal and in terms of servicing and access. These issues mean that securing land for employment development here is very difficult in the short to medium term. It is understood that a significant area of this site is very soon to be the subject to a planning application for a large single user, which will significantly reduce the

availability of land here for localised SME led demand in this area. There are also issues and concerns associated with the allocation of future employment land provision on a site, which is monopolised by Manchester Airport Group. Any supply is subject to the operational needs of the airport operator, who is currently consulting on further expansion of the airport, which will inevitably have an impact on the appetite for non-core activities and puts a further question mark over the reliance on this site, as providing a supply of readily available land to meet the local and migratory needs of businesses. Proposed Allocation at junction of Bedlars Green Road and Dunmow Road Start Hill. The respondent's land at the junction of Bedlars Green Road and Dunmow Road extends to some 2.0 hectares. The land is well screened and accessible to the highway network, being almost immediately adjacent to Junction 8 of the M11. Discussions with the Highway Authority have revealed that a junction on to Dunmow Road would be acceptable and an initial design has been agreed. The site is bounded by a number of trees, which can be protected and would be clear of any development. The site has also been the subject of detailed phase one habitat assessments, which reveal that the site could be developed with some ecology mitigation. There is also the possibility of some ecological enhancement, with land being provided as part of any development, as a termination of the Local Wildlife designation of the Flitch Way. Surface water can be managed on the site, as part of a sustainable drainage strategy. The site is not within the Green Belt; however, it is acknowledged that the land falls within the Countryside Protection Zone (CPZ) around the airport. It should be noted however, that the author of these representations made a similar case to the Draft Local Plan abandoned in 2015, in relation to the recently developed site at Dunmow Road, Start Hill. This site, which is adjacent to the Stansted Distribution Centre, and is now known as Vision Stansted, was also in the Countryside Protection Zone at the time the representations were made. However, having regard to the planning balance, it was allocated for employment use, a planning permission was subsequently granted and the site was quickly built and occupied as predicted, due to the known demand and the lack of available employment sites in the District. This same scenario is being repeated now, it is fair to say that if a business wishes to erect a new employment shed in the District now, there are no sites currently available, which have good accessibility to the strategic highway network. The respondents put the respondent's site forward in a pre-application submission, based on a specific requirement at the time from The Samaritans, for a proposal to build their European Headquarters. Officers did not support the proposal, simply because the site was not allocated and in view of its location within the CPZ. The Samaritans, frustrated by the lack of available land and the time taken to secure a site, chose to move operations to the USA. The case made to Officers in the pre-app, continues to be valid now. That case includes details of the employment land supply that was available (September 2016) which has not improved and provides details of the list of known requirements for land held by local commercial agents Coke Gearing. These documents along with a plan of the respondent's site is to be sent separately to planningpolicy@uttlesford.gov.uk. The evidence is that allocations for future employment land being placed in just two locations (Chesterford and MAG Northern Ancillary Area) does not assist businesses seeking land that is available now, for non-office related employment development. The airport land is not available in the short to medium term and is entirely dependent on the operations of a private business, who holds the monopoly on the only available of non-office related employment development land in the District, this cannot be a healthy position and does not assist the creation of jobs in the District. The employment policies of the Draft Plan are not consistent with the advice provided to local authorities in the National Planning Policy Framework (NPPF). It cannot be said that the policies and employment strategy as proposed in the Plan, is consistent with the NPPF, which requires at para 21 that :- Planning policies should recognise and seek to address potential barriers to investment, including a poor environment or any lack of infrastructure, services or housing. In drawing up Local Plans, local planning authorities should: set out a clear economic vision and strategy for their area which positively and proactively encourages sustainable economic growth; set criteria, or identify strategic sites, for local and inward investment to match the strategy and to meet anticipated needs over the plan period; support existing business sectors, taking account of

whether they are expanding or contracting and, where possible, identify and plan for new or emerging sectors likely to locate in their area. Policies should be flexible enough to accommodate needs not anticipated in the plan and to allow a rapid response to changes in economic circumstances; plan positively for the location, promotion and expansion of clusters or networks of knowledge driven, creative or high technology industries; identify priority areas for economic regeneration, infrastructure provision and environmental enhancement; and facilitate flexible working practices such as the integration of residential and commercial uses within the same unit.

- Support for the positive approach to job growth in the Plan and in particular support policy EMP1 and paragraph 5.35 which recognise that the new Garden Community at North Uttlesford (NUGC), alongside new homes, will provide a range of employment opportunities including B-use class employment together with the job opportunities created through the educational, healthcare, retail and community uses providing opportunities for the new residents of the community as well as for existing communities in the surrounding area. Grosvenor recognise that the exact scale and nature of the new employment opportunities will be determined through the masterplanning of the new community. Grosvenor support paragraphs 5.40 to 5.43 in also recognising the importance of the provision of reliable and fast digital infrastructure for businesses and support paragraph 5.44 in recognising its importance towards contributing to sustainable work practices that reduce the need to travel through home-working which, together with the range of employment opportunities that will be provided in the new settlement will enable a high degree of internalisation of travel-for-work journeys to be achieved. The job opportunities in the new community will complement the comprehensive employment opportunities that already exist in the immediate area including at the Chesterford Research Park, the Wellcome Trust Genome Campus, Granta Park and the Babraham Institute, access to which will be supported through a sustainable transport strategy. Grosvenor support paragraph 5.37 that recognises and supports the expansion opportunities to create an additional 900 jobs at the Chesterford Research Park which forms part of the Southern Cluster of Life Science Campuses in the area and in particular the positive relationship that the Park and NUGC can have. The Bidwells Professional Commercial Commentary upon the Economic Growth & Innovation Sector in North Uttlesford and Southern Cambridgeshire, June 2016 (submitted in response in response to the Council SLAA), identified significant additional employment potential within the Southern Cluster of life science campuses with an estimated potential growth of 3 million sq ft of additional floorspace over the next 5 years as well as highlighting the importance with the sector of achieving a positive live work lifestyle with high quality housing and community facilities in close proximity to places of work. The new settlement is also considered well located in relation to the two recognised strategic growth corridors of the London Stansted Cambridge corridor and the Oxford Milton-Keynes Cambridge corridor, with access to strategic transport infrastructure providing connectivity along these corridors including the West Anglia railway line.
- Employment and Economic Development Sustainable Uttlesford consider the priorities for sustainable economic development and employment during the Local Plan period should be Reducing number (and distance) of journeys to work through greater home working and less commuting out of the district south to Greater London which puts pressure on the local transport infrastructure eg M11 and West Anglia main line. The provision of new housing stock with tenures that fully reflect the range of employment opportunities, incomes and qualifications enjoyed by local residents; Greater support of knowledge economy campuses and workers located in South Cambridgeshire to the north of the district through the creation of the North Uttlesford Garden Village. Greater encouragement of start up businesses through the provision of incubator units at below market rents for an initial time limited period. Ensuring that SMART technologies including broadband are provided to all new housing in the Garden Villages. The

employment and economic development policies in the Plan as currently drafted Plan appear to take all our eggs in the Stansted Airport basket approach with projections that 50% of employment growth will be in service/warehousing industries. There is are no policies that relate to non airport related vocational training provision. Sustainable Uttlesford(SU) consider any application to increase the current level of permitted flights at Stansted during the plan period to be premature. SU do not consider that LPA should make the decision about the future increase of use of the single runway at Stansted. It is the responsibility of the National Government to publish a national Airport Policy including their final decision on additional runway capacity in the South East to ensure that is compliant with the Paris Climate Change Accord.

- Sustainable Uttlesford consider the priorities for sustainable economic development and employment during the Local Plan period should be Reducing number (and distance) of journeys to work through greater home working and less commuting out of the district south to Greater London which puts pressure on the local transport infrastructure eg M11 and West Anglia main line. The provision of new housing stock with tenures that fully reflect the range of employment opportunities, incomes and qualifications enjoyed by local residents; Greater support of knowledge economy campuses and workers located in South Cambridgeshire to the north of the district through the creation of the North Uttlesford Garden Village. Greater encouragement of start up businesses through the provision of incubator units at below market rents for an initial time limited period. Ensuring that SMART technologies including broadband are provided to all new housing in the Garden Villages. The employment and economic development policies in the Plan as currently drafted Plan appear to take all our eggs in the Stansted Airport basket approach with projections that 50% of employment growth will be in service/warehousing industries. There is are no policies that relate to non airport related vocational training provision.
- 5.20 recognises "There is an aspiration for "strategic warehouse and distribution depots in locations with ready access to Junction 8 of the M11" but the policy text (second bullet) introduces a restriction for non-strategic warehousing. This is assumed as an error as there are no other instances of such a text and it is inconsistent with other references to the Northside of the airport site. Furthermore, this is inconsistent with references contained within the Employment Land Review 2017 (which are reflective of the text in 5.20). The third bullet which states Support and protect the provisions of airport related commercial uses within the airport boundary as set out in Policy SP11; should be made clear that this is for sites other than the Northside allocation. Inset Plan As per comments on SA1, the site as described in the policy does not match the site in the inset plan. The inset plan shows both a yellow and brown policy area, splitting the site in two. This should be revised to show one area with references to SA1, SP11 and EMP1. Supporting Text 5.36: Inconsistent reference to 43ha should be 55ha. No likely proposition for B1 development.
- Support. Effective broadband and allied technology improvements are overdue. Access to technology is critical to empowering a working rural population and encouraging employment. It may be counter intuitive but technology may be one of the critical saviours of a rural economy. In this the Society opposes all change of use to residential, in any form. Available commercial space encourages use.
- The Council has expended significant effort in developing a strategy for the location of what is claimed to be sustainable economic and housing growth for the next 20 years. In terms of economic development it has obtained and continued to update a review of employment land a key driver of economic growth. The key conclusions of the ELR are that there should be an approach towards to the provision of employment land comprising: Support for appropriate uses within town centres; Protection, but also monitoring, of existing employment sites; Continued

growth of appropriate employment at the regionally strategic locations of Stansted Airport and Chesterford Research Park; The delivery of appropriate employment uses within the proposed new settlements; and The identification of suitable new sites to provide flexibility for additional employment growth that is for whatever reasons cannot locate to or is not appropriate on the above sites. The draft Local Plan appears to completely ignore the last of these. In short, the draft Local Plan appears to propose that, for the next 20 years, employment development within the District be constrained to, only: Town centres; Existing employment sites; Stansted Airport and Chesterford Research Park; and The proposed new settlements. We are of the view that this strategy entirely fails to reflect the conclusions and recommendations of the Council's own evidence base that supposedly provides the justification for the proposed strategy, and will fail to provide the required range and choice of land for employment development. As such, we are of the view that Chapter 3 (Spatial Strategy) and particularly Policy SP4, and Chapter 5 (Employment) and particularly Policies EMP1 and EMP2 do not provide a sound basis for employment development in Uttlesford over the plan period. We are therefore of the view that the draft Local Plan has not been positively prepared, is not justified, will not be effective, and is not consistent with national policy The Needs of East Hertfordshire. In addition, there is no evidence that the needs of Bishop's Stortford, within neighbouring East Hertfordshire and which immediately abuts and is therefore constrained by any proposals within Uttlesford (as well as other factors), have been taken into account or meaningfully discussed and a strategy to address those needs agreed with East Hertfordshire. On this basis, we are also of the view that the draft Local Plan fails the required duty to cooperate.

- We are pleased to note that the Regulation 18 Local Plan document refers to Chesterford Research Park as one of the key locations for employment in the District. Representations have been made at each stage of plan preparation in Uttlesford including in the 2015 Call for Sites showing how there is additional capacity within the Park to meet medium and longer term needs. In considering influences on the employment strategy, it is important to appreciate that the District works within a wider market. For Chesterford Research Park, that context is significantly affected by Cambridge and the demand that arises from research and development businesses in advanced technology sectors. The need for new floorspace is often related to the funding of new areas of research and it is vital for those providing buildings to be responsive and flexible as requirements vary and timescales can be tight. Chesterford Research Park is competing with other research parks around the sub-region and needs to be able to offer a choice of sites and building options, as well as being able to provide a mix of uses to support the region. In addition, the park will assist to support the creation of a new garden community in North Uttlesford (as detailed in Policy SP7), with links to Chesterford Research Park to be maximised. The further development and enhancement of Chesterford Research Park will be important to the creation and successful development of this new community. Chesterford Research Park is an ideal location as a focus for additional employment development within the District. There is already considerable investment in infrastructure and support services, including the Nucleus building which provides the Park with meeting rooms, restaurant, gym etc. The location is close to the M11 and Audley End and Great Chesterford Stations, it is near Cambridge and has good access to Stansted Airport. The previous Local Plans have supported the further development of the Park and that should continue. The Park development boundary for the next plan period needs to be extended as per the attached Masterplan drawing to provide flexibility and choice for the reasons set out above. Therefore whilst we welcome the support given to Chesterford Research Park in the Regulation 18 Local Plan document, the policy should also support its further expansion to assist with meeting the overall employment need and requirement to allocation additional employment sites within the District - as well as supporting a greater range of employment uses within the park.

- Policy EMP 1 Employment Strategy and Policy EMP 2 Existing and Proposed Employment Areas. The respondents object to the Plan on the basis that it is not justified, in respect of making sufficient employment land provision. The respondent's own land at the junction of Bedlars Green Road, Dunmow Road and Start Hill, which was put forward as a proposed employment site as part of the Council's Call for site exercise in 2015. The site has not been proposed as an employment allocation in the Draft Plan, which the respondents believe is a missed opportunity, as the proposed allocations do not make adequate provision for the employment needs of the district.
- The new garden community west of Braintree straddles the District boundary with Braintree District Council. As well as homes there will be a range of local employment opportunities and services. As stated in the Publication Draft Local Plan the garden community will be located close to the A120 this garden community will be conveniently located to Braintree and London Stansted Airport for employment opportunities. The Council will work closely with Braintree District Council to ensure that this garden community is jointly master planned and delivered. Previous Submissions My clients put forward the site in in May 2015, under the Call for Sites Exercise, with further details submitted in February 2016 for a site for B8 Storage or Distribution. Council Reference 03Fel15. The submission included the Master Plan reference NC_15.199-P-200, showing approximately 9,550 square metres of floor space and a landscape Nature Reserve. Plan enclosed. The site is situated between the B1256 and the A120. Comments on the Regulation Publication Draft Local Plan The Publication Draft Local Plan states that the three new Garden Communities will each deliver a range of B-use class employment opportunities on site. The exact scale and nature of the employment opportunities will be determined through the master planning of each new Garden Community. Paragraph 5.35 and EMP 1 refers. In correspondence with Ms Nicholas of UDC in June 2017 she advised that: The regulation 18 Plan identifies the new garden communities as broad location on the Key diagram and the Policies Map. However these broad locations are indicating that development is not extending south of the B1256. The Council will in time need to consider the master planning of the site and the relationship to parcels of land such as your clients and whether they are included. I suggest you make appropriate representations when the plan is published for consultation in July. Draft Braintree Council Policy SP 10 of the Publication Draft Local Plan in respect of the new Garden Community Proposal states at paragraph C Employment and Jobs: This may include space for B1, B2 and B8 businesses in the southern part of the community close to the A120 as well as on non-employment park locations throughout the Garden Community to provide for a wide range of local employment opportunities Under the BDC Proposals Map the site access and frontage sits partly within this southern area. (The access to the site). Currently in the Uttlesford Plan the site abuts the Garden Community. Land to the west and east of the site is also excluded. In Planning terms it seems illogical to exclude these areas given the proximity to the A120 for access, that the land will become isolated between the B1256 and the A120, and its usefulness for any agricultural purposes will be diminished due to isolation and proximity to surrounding large scale infrastructure and comprehensive commercial development within the Garden Community and the likely B1, B2 and B8 uses. Although the Call for Sites Form specified B8 this was completed at a time when the Garden Community had not formally been put forward. Clearly my clients site will be capable of delivering a range of B-use class employment. Matters of access to the A120 in both directions are addressed at Uttlesford Policy SP 8, point 5 advising that reconfiguration and improvements to the junctions on the A120 in this area will allow access in all directions. That enhancements and contributions will be sought for this and other highway infrastructure proposals. The proposed site will be able to make a positive contribution to support this. It should also be noted that the proposal also includes the provision of a landscape Nature Reserve which can contribute towards the overall public open space for the Garden Community. Even if the Garden Community does not come forward there are strong Planning Arguments for the allocation of the site for employment use

because of its location abutting the A120. We request that we are contacted and involved in the discussions with land owners, developers, stakeholders, consultees and the Council in the Master Planning of the Garden Community and the relationship of my clients land to the Garden Community. Thank you. Similar submissions have been made to Braintree Council under their Publication Draft Local Plan

4.0 Policy EMP1 Employment Strategy 4.1 The DLP confirms that currently, there is 1 major employment centre in the South of the District at London Stansted Airport, a key employment area at Chesterford Research Park and smaller industrial estates located in settlements such as Saffron Waldon and Great Dunmow. 4.2 Currently, there is a total of 38 employment clusters in the District, totalling 256 hectares in size, consisting of B use class, non B use class and vacant sites. There is an estimated 80.5Ha of Industrial Land and 99,000sq.m of office floorspace in the Uttlesford District. 4.3 Although there has been progression in industries such as Transport and Communication, due to the growth of London Stansted Airport, there has been a decline in jobs in manufacturing. Furthermore, the DLP has confirmed that 68.4% of the residents of Uttlesford community beyond its boundaries, often to many distant employment centres. 4.4 The DLP states that approximately 14,360 jobs will be provided over the Local Plan period. Of these, 1,500 jobs will be in office, manufacturing and warehousing. In light of this, the Employment Land Review (ELR) has confirmed that 21,000sq.m of additional floorspace is required over the Local Plan period. 4.5 Of the 14,360 jobs provided throughout the Local Plan period, 700 jobs are to be created in the warehousing sector. In addition, there are 700 jobs in the manufacturing sector which are to be lost in the Local Plan period, therefore there is no net jobs growth in the Industrial Sector over the Local Plan period. 4.6 In addition, there is a requirement to provide 10.2ha of Industrial Land between 2016 and 2033, due to the provision of new jobs. 4.7 Further to these employment land requirements, Paragraph 5.28 of the DLP states that there are 38 Safeguarded employment sites located within the District. The DLP states that some of these site have further potential to redevelop, whilst some have no potential for further redevelopment. 4.8 It is our opinion that as some of these sites have no potential for further development, they are correctly identified as not being within the range of land available for additional Land at Slamsey's Farm 9 employment in the future. As such, alternative sites which have the potential to be redeveloped for future employment should be put forward in place of those which cannot. Further comment on this can be found in Section 5.0 of this representation.

Policy, as currently worded would appear to restrict development within existing and proposed employment areas to Class B uses. It is considered that such a restriction is unnecessary and is likely to unduly prohibit sustainable employment generating development, which may otherwise be delivered. For these reasons Policies EMP2 and EMP1 and the supporting text at paragraphs 5.46 and 5.4 as currently drafted are not compatible with National Planning Policy set out in the NPPF and do not represent the most appropriate approach to planning for sustainable economic development. Consequently, it is considered that the draft Local Plan remains unsound' in the context of paragraph 182 of the NPPF and requires amendment as set out below, which would address our objections. Policy EMP1 - Employment Strategy - Revise Fifth bullet point to read: The existing Principal Employment Areas set out in Appendix 6 as shown on the Policies Map shall be protected for B1, B2 or B8 uses. Other appropriate sui - generis and complementary employment generating uses may I so be permitted . Once developed, strategic allocations containing B1, B2 or B8 uses are safeguarded as Principal Employment Areas. Changes of use or redevelopment within the employment areas and sites which would result in a loss of floorspace for economic development uses will be resisted.

Individuals

Four Individuals

- Sixth bullet affects should be effects

- If UDC is serious, surely the first point should be about proactively encouraging employment opportunities in the Garden Communities, not just supporting. The second point refers to 43 hectares, contrary to the 55ha in policy SP11.
- Given the plan acknowledges that most residents work outside the boundaries of Uttlesford, why is there so little in the employment strategy about improving the local transport infrastructure, eg parking (especially at railway stations), roads, local bus services? Why is it so hard to get to railway stations by public transport in Uttlesford, even from Saffron Walden (the largest town) to Audley End?
- P76, EMP1, Employment: I oppose the policy change that would allow industrial and commercial development at Stansted Airport that is unrelated to the airport.

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Significant, Temporal and Secondary Effects - The policy will have significant positive impacts on employment and economic growth, and also education and skills through work with education providers and business representatives to encourage the provision of educational and vocational training courses which match the skills required by new and emerging businesses. This, notionally, can be expected to assist in addressing high commuting patterns in the long term. There will also be minor positive impacts on access in relation to the balance of dwellings and employment provision within the Plan.

Alternatives Considered - The ELR identifies the amount of employment land and floorspace needed during the plan period and makes recommendations as to where it should be located within the District. The findings of this important piece of Plan evidence are extended to the Policy, and any other broad approaches can be seen as unreasonable as a result or otherwise not distinctly different enough from the Policy approach to warrant assessment within this SA.

Proposed Mitigation Measures / Recommendations

No mitigation measures or recommendations are proposed.

Existing Employment Areas

Paragraph 5.46

This paragraph was responded to by one organisation and two individuals.

Support	0
Object	1
Comment	2

Overarching Summary

- How does this EMP2 work with permitted rights to change from business to residential if you don't change the external appearance? Great Chesterford already has around 10 dwellings created in this way in Station Rd, Great Chesterford which is included in your employments sites schedule; more are likely to follow.
- Policy, as currently worded would appear to restrict development within existing and proposed employment areas to Class B uses. Para 5.46 - Revise to read as follows: (new text underlined, deleted text strike through) The policy recognises that there is a significant amount of employment generated by appropriate sui-generis and other complementary uses, e.g. builders merchants and car showrooms, which may be permitted as part of the overall employment strategy.

Statutory consultees and other bodies

None

Developers/landowners/site promoters

Policy, as currently worded would appear to restrict development within existing and proposed employment areas to Class B uses. It is considered that such a restriction is unnecessary and is likely to unduly prohibit sustainable employment generating development, which may otherwise be delivered. For these reasons Policies EMP2 and EMP1 and the supporting text at paragraphs 5.46 and 5.4 as currently drafted are not compatible with National Planning Policy set out in the NPPF and do not represent the most appropriate approach to planning for sustainable economic development. Consequently, it is considered that the draft Local Plan remains unsound' in the context of paragraph 182 of the NPPF and requires amendment as set out below, which would address our objections. Para 5.46 - Revise to read as follows: (new text underlined, deleted text strike through) "Existing and proposed employment areas which are to be retained in these uses are identified on the Proposals Map. The policy also sets out the requirements that would have to be met in order to warrant making an exception to the policy of retention and permitting changes of use to non-employment uses. The policy recognises that there is a significant amount of employment generated by appropriate sui-generis and other complementary uses in ancillary B class uses, e.g. builders merchants and car showrooms , which may be permitted should be protected as part of the overall employment strategy.

Individuals

Where is the Proposals Map? I couldn't find it at 3.73 and I can't find it now.

How does this EMP2 work with permitted rights to change from business to residential if you don't change the external appearance? Great Chesterford already has around 10 dwellings created in this way in Station Rd, Great Chesterford which is included in your employments sites schedule; more are likely to follow.

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Not applicable

Existing and Proposed Employment Areas

Policy EMP2

This policy was responded to by 16 people/organisations.

Support	2
Object	7
Comment	9

Overarching Summary

- Concerns around the level of interest for employment land in the district.
- The NPPF states that 'Planning policies should avoid the long term protection of sites allocated for employment use where there is no reasonable prospect of a site being used for that purpose.'

- Policy does not acknowledge important role of supporting (non B-class) uses in establishing successful business parks.
- We should clearly support the intensification of Principal Employment Areas.
- Employment sites in the Green Belt should be reviewed so as to allow reasonable expansion of existing employment sites.
- Allocations for future employment land being placed in just two locations (Chesterford and MAG Northern Ancillary Area) does not assist businesses seeking land that is available now, for non-office related employment development.
- We should recognise and seek to address potential barriers to investment, including a poor environment or any lack of infrastructure, services or housing.
- The plan should be flexible enough to accommodate needs not anticipated in the plan and to allow a rapid response to changes in economic circumstances.
- Concerns over the marketing period suggested in the policy, either being too long or too short.
- Conversion to residential should not be encouraged.

Statutory consultees and other bodies

The Thaxted Society - EMP2 Support. We would object to most instances of change based upon 'no longer viable / employment' proof, without a seriously strengthened Appendix 5

As before with improved enforcement criteria for evidence base Appendix 5

Saffron Walden Neighbourhood Plan Group - Why invite people to come up with schemes to convert industrial sites to residential? It should be done on the basis of continued vacancies. Saffron Walden has a real opportunity to build on its reputation as a centre of creativity and more could be done to encourage further employment along the lines of Fairycroft House, with studio space for artists and workshop/creative opportunities. More needs to be done to help and encourage start-ups. Suggestion: Conversion of industrial to commercial should be allowed and new sites should be built with flexible accommodation that can be used as commercial or light industrial.

Stansted Neighbourhood Plan Steering Group - Why invite people to come up with schemes to convert industrial sites to residential? It should be done on the basis of continued vacancies. More needs to be done to help and encourage start-ups. Suggestion: Conversion of industrial to commercial should be allowed and new sites should be built with flexible accommodation that can be used as commercial or light industrial.

Saffron Walden Town Council - Conversion to residential should not be encouraged.

Essex County Council - Policy EMP2 Existing and Proposed Employment Areas (page 77) and Appendix 5 Marketing Assessment Information Whilst ECC is broadly supportive of the Marketing Assessment described within Appendix 5 of the Draft Local Plan, ECC recommends that UDC review the minimum period of time (12 months), outlined in the draft Local Plan, that commercial property is required to be marketed for when requesting a change of use within a designated employment site. ECC is mindful of the need to deliver housing, and given the strength of residential property values in UDC compared to commercial property development, ECC wish to ensure that any fluctuations in the performance of the commercial property market do not result in an unnecessary loss of commercial workspace in the district. ECC is also mindful that there are variations in approaches across Essex, and therefore it is recommended the UDC review the minimum marketing period given the existing evidence would suggest that a marketing period of 2 years will be applicable for a number of employment types. Further discussions with ECC are welcomed on this matter. ECC would welcome exploring whether varying marketing strategies may be adopted dependent on the use class, nature of the employment allocation (whether it is a newly proposed site or older employment site) and if there is a specific short fall in a particular use class.

Thaxted Parish Council - To be commended - Support policy

Developers/landowners/site promoters

- Draft Policy EMP2 sets out the policy criteria against which proposals to change the use of existing employment areas will be judged. Turnstone St Neots Ltd has an interest in Land at Ashdon Road, Saffron Walden. Land at Ashdon Road is identified as an existing employment site. As the Council, will be aware, land at Ashdon Road was granted outline planning permission in 2014 for the mixed use development of the land. In broad terms, land to the west of the central access was approved for residential use and land to the east of the access drive was approved for commercial use. Following the grant of planning permission, all of the existing employment buildings were demolished and cleared from the site. A new (replacement) Ridgeons building has since been constructed and the remaining commercial land parcels have been serviced and prepared for development. The commercial land parcels are illustrated on the attached masterplan (drawing S035/P103) as being phases 1a (Ridgeons), 1b, 3 and 5. The commercial land at Ashdon Road has been the subject of a comprehensive marketing campaign since August 2014. This marketing exercise has been unsuccessful with no interest in the commercial land for class uses being raised. Of those parties who have registered a general interest in commercial/industrial floor space, the reasons for not pursuing land at Ashdon Road have included the poor access, especially for HGV's, the fact that site is not large enough and has poor road side visibility, together with competition from established sites that are better suited to their needs. The National Planning Policy Framework advises at paragraph 22 that Planning policies should avoid the long term protection of sites allocated for employment use where there is no reasonable prospect of a site being used for that purpose. Land allocations should be regularly reviewed. Where there is no reasonable prospect of a site being used for the allocated employment use, applications for alternative use of land or buildings should be treated on their merits having regard to market signals and the relative need for different land uses to support sustainable communities. □ The marketing of the site is on-gong but it has already been established that there is no reasonable prospect of the remaining commercial land at Ashdon Road being brought forward for commercial use. With the Ridgeons plot already having been delivered (phase 1a), it is considered correct to retain employment use to the phase 1b land which sits in front of the Ridgeons store. Residential use of this land would not be appropriate. In the case of Phase 3 and Phase 5, both land parcels are however suitable for residential use. In the absence of any market interest for commercial/employment uses, it is clear from paragraph 22 of the NPPF that the emerging Local Plan should avoid the long term protection of these parts of the Ashdon Road site. To continue to protect these development phases for commercial use would fail to have regard to market signals and would be in conflict with national guidance. In order for Policy EMP2 to be consistent with national policy and therefore sound, the Draft Policies map should be redefined with the protected Employment land designation relating to phases 1a and 1b only, as shown on the attached drawing, (drawing S035/P103). While this revision will reduce the amount of protected employment land it will still provide policy protection for the following: 1.8ha of land for a Sui Generis Builder's Merchant providing 5,939m² of floor space Phase 1a 0.76ha of land providing 3,650m² of B1 or B2 floorspace Phase 1b In total therefore, across land known now as Phases 1a and 1b, 9,589m² of floorspace either has been delivered or is available for commercial development. The outline application that was approved in 2014 established the commercial use of all commercial land phases at Ashdon Road (i.e phases 1a, 1b, 3 and 5). The consented development was assumed capable of delivering 11,347m² of either B class floorspace and/or a Sui Generis builder's merchant. 84% of the commercial floorspace original assumed either has or can still therefore be delivered if the Employment area designation on the polices map were to relate to phases 1a and 1b only. While it is considered that phases 3 and 5 should no longer be given policy protection because of the clear market signals that have been established through the extensive marketing of the site, the suggested revision to the Policies Map will ensure that an extensive area of commercial land/floorspace is retained. The proposed revision to the polices map is therefore in accordance with national guidance, the aims and objectives of the Local Pan

to retain viable employment areas near to residential areas, is effective and justified and therefore sound. By releasing phases 3 and 5 for residential development, land at Ashdon Road will also be capable of delivering much needed housing to help address the Council's housing shortfall. It would also release a deliverable brownfield housing site that can support the Council's Spatial Strategy for growth, which, as discussed further in our corresponding representations, is currently found to be unbalanced, not based on credible evidence and is ultimately undeliverable and unsound. Suggested revision: Amend the Policies Map for Saffron Walden to identify only Phases 1a and 1b, as illustrated on the attached drawing, (drawing S035/P103) as being an Existing Employment site Notwithstanding the above, Turnstone St Neots Ltd object to the current wording of Policy EMP2. As set out above, the land which is currently zoned for employment use has been the subject of an extensive marketing campaign. This marketing campaign has confirmed that there is no reasonable prospect of this employment land coming forward for employment use. As drafted, Policy EMP2 states that change of use of existing and proposed employment sites will only be supported where all of the policy criteria is met. In short this requires a development to demonstrate that the alternative/proposed uses provide an essential community benefit which cannot be located elsewhere, that the proposed use would not conflict with any existing commercial uses and that the site is not viable for commercial use. If it is demonstrated that the commercial land is no longer viable, or in the case of proposed employment sites, that there is no market interest and no reasonable prospect of any interest emerging, and if it is demonstrated that the proposed change of use will not conflict with any existing or potential employment use of surrounding land, the change of use proposal should be supported. The further policy test of demonstrating that the proposed use will satisfy an essential community benefit which cannot be located elsewhere in the area is an additional policy burden that is unjustified and unnecessary. In the case of land at Ashdon Road, it has already been demonstrated that Phases 3 and Phases 5 are not suitable for commercial use as there is no market interest. These development plots about residential land parcels and the use of these land parcels for residential use is the most appropriate use of the land. There is no policy justification, having regard to the NPPF to also require applications to demonstrate that housing cannot be located elsewhere within the area. As a result, and in order to ensure Policy EMP2 is consistent with national policy and therefore sound, it is requested that bullet point 1 be deleted. Suggested revision delete bullet point 1 of Policy EMP2

- We support the allocation of Thremhall Park as a Principal Employment Area as set out at appendix 6 of the draft Plan. Our concerns with policy EMP2 mirror those raised for EMP1, namely first that no explicit support is given for the intensification/expansion of Principal Employment Areas, and second, the policy does not acknowledge the important role of supporting uses in establishing successful business parks. Intensification/Expansion of Principal Employment Areas We are concerned that the wording of EMP2 is not sufficiently clear in its support for the intensification of Principal Employment Areas. As set out in our representation to EMP1, the intensification of a number of these areas is a specific component of employment land supply in district as set out in the Employment Land Review Update 2017 and should therefore receive explicit support. Policy EMP2 refers to safeguarding Principal Employment Areas for B-class uses. It does set out policy for the change of use or redevelopment or extension of sites or premise but in fact the policy only relates to proposals for uses other than those identified above (ie non B-class uses). As such the policy does not clearly offer support for the expansion/intensification of Principal Employment Areas for employment uses. Given, as set out in full in our response to policy EMP1, expansion/intensification of sites including Thremhall Park is a key component of employment land supply during the Plan period, we consider that EMP2 should offer clear support for this within the policy wording. Supporting Uses Our representation regarding EMP1 sets out our concern regarding the restrictive approach to supporting uses such as cafes within Principal Employment Areas given the importance of these uses to creating a vibrant and successful business park environment at Thremhall Park. This concern applies equally to policy EMP2, which specifically seeks to exclude non-B Class uses.

The criteria set out within EMP2 concerning proposals for non-B Class uses (community benefit, lack of conflict with B class uses and demonstrable proof of the non-viability B class use) do not reflect the role of supporting uses and should be revised to permit their existence and acknowledge their importance.

- Whilst we support the safeguarding of existing employment sites for employment use, we object to the restrictive nature of this policy. We welcome the reference in Policy EMP2 to change of use or redevelopment or extension however, do not consider that the wording of the policy does indeed support these. In summary, our concerns are: EMP2 does not explicitly support the intensification/expansion of the Principal Employment Areas, contrary to the recommendations of the Employment Land Review Update 2017. The wording of EMP2 is excessively restrictive with regard to supporting uses. Intensification/Expansion of Existing Employment Areas We are concerned that the wording of EMP2 is not sufficiently clear in its support for the intensification of existing employment sites; despite referring to 'redevelopment or extension', Policy EMP2 makes no provision for these. As set out in our representation to EMP1, the intensification of a number of these areas is a specific component of employment land supply in district as set out in the Employment Land Review Update 2017 and should therefore receive explicit support. Policy EMP2 primarily relates to applications for the change of use to non-employment uses. It is negatively worded so as to restrict the approval of such applications other than in exceptional circumstances. None of the provisions of the policy are relevant to an application for the intensification, redevelopment or expansion of an existing employment site, for the same use or change to another employment use not falling within Class B. It is therefore assumed that applications for redevelopment or extension for employment uses will be determined in accordance with national policy, which is supportive. Whilst this is welcomed and will be effective in non-Green Belt areas, it will not allow the expansion of employment sites in the Green Belt. The NPPF is clear at paragraph 83 that Green Belt boundaries, should only be altered through a review of the Local Plan. Therefore, unless the Green Belt boundaries are set so as to allow reasonable expansion of existing employment sites, they will be prevented from growth and development in their existing locations for the entirety of the plan period. We suggest the insertion of an additional policy, dealing specifically with growth and expansion of new and existing businesses which reflects the policy support for economic development in the NPPF. Specifically, a policy to support sustainable economic growth and the growth and expansion of all types of business and enterprise in the District to allow existing businesses to grow without relocating. Without the ability to expand at their current locations, established businesses could be lost from the district which would be contrary to Objective 2a of Chapter 2 of the consultation document. This aims to strengthen the local economy by enabling the growth of existing and new employers through the provision of suitable land and premises in sustainable locations to meet the anticipated needs and aspirations of businesses including providing opportunities for employment growth related to Stansted Airport. We also suggest the boundaries of existing employment sites within the Green Belt be reviewed in order to allow expansion of sites. For example, SLAA sites 03Sta15, 04Sta15 and 05Sta15, Land adjacent to M11 Business Link, Parsonage Lane, Stansted, would all allow expansion of an existing established employment site. The Green Belt Review considers the boundaries of this employment site only in the context of the whole of land parcel 8 which stretches from Stansted Mountfitchet to Bishop's Stortford. Whilst this is judged to make a strong contribution to the Green Belt, the wider parcel serves a very different purpose from the small SLAA sites adjacent to the employment site. Supporting Uses The policy as drafted supports B Class uses only, with recognition for non-B Class uses only supported where they are auxiliary to the B Class uses. The supporting text recognises that other types of employment are to be provided in the district, but are not provided for in the employment policies. It is not clear why this is the case and we consider that other employment uses are of equal importance and that changes of use to other employment uses, whether B Class or not, should be permitted within the existing employment sites under this policy. Our representation regarding EMP1 sets out our concern regarding the restrictive

approach to supporting uses such as cafes within existing employment areas given the importance of these uses to creating a vibrant and successful business park environment. This concern applies equally to policy EMP2, which specifically seeks to exclude non-B Class uses.

- Policy EMP 1 Employment Strategy and Policy EMP 2 Existing and Proposed Employment Areas. The respondents object to the Plan on the basis that it is not justified, in respect of making sufficient employment land provision. The respondent's own land at the junction of Bedlars Green Road, Dunmow Road and Start Hill, which was put forward as a proposed employment site as part of the Council's Call for site exercise in 2015. The site has not been proposed as an employment allocation in the Draft Plan, which the respondents believe is a missed opportunity, as the proposed allocations do not make adequate provision for the employment needs of the district. The respondents object to the Plan on the following basis :- Paragraph 5.4 - The ELR seems to be based upon a direct link between population growth and employment requirement - this takes no account of the expansion requirements of existing business or inward migration (e.g. from NE London or Harlow) of businesses looking to locate in the District. Local and highly respected commercial agents, Coke Gearing has advised the respondents that it is their experience through the many enquiries they receive that urgent provision of sites is needed now to meet a known demand. Paragraphs 5.11/12/13 - these seem to be broad assumptions without evidence? Paragraph 5.28 The respondents remind the Council that these sites have already been developed and are now occupied. Whilst the Council acknowledge that new employment land needs to be allocated for future demand, which has been calculated as 10.2 ha up to 2033, the current demand, which is significant, is not being met with a ready supply of good quality employment land, as a result, the Council is missing out on job creation opportunities. The draft plan makes provision for an additional 10.2 ha, which is to form part of allocations at existing sites at Chesterford Research Park and at London Stansted Airport (Northern Ancillary Area). In the case of the former, the site is not suitable for larger shed development, which is in demand now, and in the case of the latter, the availability of land here is subject to significant constraints, see Para 3.6 below. Paragraph 5.31 this site is poorly located in terms of transport (other than car) and is the wrong side of the airport- the development is stalled due to lack of occupier interest (it is not 40% pre let). Paragraph 5.32 this is the Vision Stansted site, which is now fully developed and occupied. This site was put forward in a similar way to the respondent's site in representations made to the draft Plan in 2012. It was subsequently allocated, an application made for its development, approval granted, the development was started immediately. The site is now fully built out and occupied by businesses that have moved into the area. Better than anything else perhaps, Vision Stansted provides evidence of demand from outside the District, it also demonstrates the popularity of the location and its proximity to J8 of the M11. The respondents and their advisors are supremely confident that an allocation on the respondent's site would prove equally successful, not least because there are no similar sites that are available in the District, which are available now, in the right condition and location. The ELR makes the very point in its para 9.3.19, which states : Start Hill south of the B1256 adjacent to the Stansted Distribution Centre , Start Hill in particular offers a strategic location within close proximity to both Stansted Airport and Junction 8 of the M11 which would be very attractive to potential warehouse and distribution occupiers The statement above exactly mirrors the attributes of the respondent's site at Start Hill. There is no capacity available at the Stansted Distribution Centre or at Vision Stansted, therefore an additional site is needed now to meet this requirement. Paragraph 5.35 from our experience and a review of these plans, the delivery of any employment will be long after delivery of the housing and infrastructure. The nature of this sort of site is that the employment development will be small scale and largely retail/service sector related. The potential for these sites to come forward and make a meaningful contribution to the requirements in the plan period is considered to be very low. It is also the case that the delivery overall of the Garden Communities is somewhat uncertain, there are employment requirements in the District now, which are not being met due to the lack of supply of available land. Paragraph 5.36 The

London Stansted Airport (Northern Ancillary Area) site is subject to a number of constraints both physical, legal and in terms of servicing and access. These issues mean that securing land for employment development here is very difficult in the short to medium term. It is understood that a significant area of this site is very soon to be the subject to a planning application for a large single user, which will significantly reduce the availability of land here for localised SME led demand in this area. There are also issues and concerns associated with the allocation of future employment land provision on a site, which is monopolised by Manchester Airport Group. Any supply is subject to the operational needs of the airport operator, who is currently consulting on further expansion of the airport, which will inevitably have an impact on the appetite for non-core activities and puts a further question mark over the reliance on this site, as providing a supply of readily available land to meet the local and migratory needs of businesses.

Proposed Allocation at junction of Bedlars Green Road and Dunmow Road Start Hill. The respondent's land at the junction of Bedlars Green Road and Dunmow Road extends to some 2.0 hectares. The land is well screened and accessible to the highway network, being almost immediately adjacent to Junction 8 of the M11. Discussions with the Highway Authority have revealed that a junction on to Dunmow Road would be acceptable and an initial design has been agreed. The site is bounded by a number of trees, which can be protected and would be clear of any development. The site has also been the subject of detailed phase one habitat assessments, which reveal that the site could be developed with some ecology mitigation. There is also the possibility of some ecological enhancement, with land being provided as part of any development, as a termination of the Local Wildlife designation of the Flich Way. Surface water can be managed on the site, as part of a sustainable drainage strategy. The site is not within the Green Belt; however, it is acknowledged that the land falls within the Countryside Protection Zone (CPZ) around the airport. It should be noted however, that the author of these representations made a similar case to the Draft Local Plan abandoned in 2015, in relation to the recently developed site at Dunmow Road, Start Hill. This site, which is adjacent to the Stansted Distribution Centre, and is now known as Vision Stansted, was also in the Countryside Protection Zone at the time the representations were made. However, having regard to the planning balance, it was allocated for employment use, a planning permission was subsequently granted and the site was quickly built and occupied as predicted, due to the known demand and the lack of available employment sites in the District. This same scenario is being repeated now, it is fair to say that if a business wishes to erect a new employment shed in the District now, there are no sites currently available, which have good accessibility to the strategic highway network. The respondents put the respondent's site forward in a pre-application submission, based on a specific requirement at the time from The Samaritans, for a proposal to build their European Headquarters. Officers did not support the proposal, simply because the site was not allocated and in view of its location within the CPZ. The Samaritans, frustrated by the lack of available land and the time taken to secure a site, chose to move operations to the USA. The case made to Officers in the pre-app, continues to be valid now. That case includes details of the employment land supply that was available (September 2016) which has not improved and provides details of the list of known requirements for land held by local commercial agents Coke Gearing. These documents along with a plan of the respondent's site is to be sent separately to planningpolicy@uttlesford.gov.uk. The evidence is that allocations for future employment land being placed in just two locations (Chesterford and MAG Northern Ancillary Area) does not assist businesses seeking land that is available now, for non-office related employment development. The airport land is not available in the short to medium term and is entirely dependent on the operations of a private business, who holds the monopoly on the only available of non-office related employment development land in the District, this cannot be a healthy position and does not assist the creation of jobs in the District. The employment policies of the Draft Plan are not consistent with the advice provided to local authorities in the National Planning Policy Framework (NPPF). It cannot be said that the policies and employment strategy as proposed in the Plan, is consistent with the NPPF, which requires at para 21 that :- Planning policies should recognise and seek to address potential barriers to investment,

including a poor environment or any lack of infrastructure, services or housing. In drawing up Local Plans, local planning authorities should: set out a clear economic vision and strategy for their area which positively and proactively encourages sustainable economic growth; set criteria, or identify strategic sites, for local and inward investment to match the strategy and to meet anticipated needs over the plan period; support existing business sectors, taking account of whether they are expanding or contracting and, where possible, identify and plan for new or emerging sectors likely to locate in their area. Policies should be flexible enough to accommodate needs not anticipated in the plan and to allow a rapid response to changes in economic circumstances; plan positively for the location, promotion and expansion of clusters or networks of knowledge driven, creative or high technology industries; identify priority areas for economic regeneration, infrastructure provision and environmental enhancement; and facilitate flexible working practices such as the integration of residential and commercial uses within the same unit.

- Policy, as currently worded would appear to restrict development within existing and proposed employment areas to Class B uses. It is considered that such a restriction is unnecessary and is likely to unduly prohibit sustainable employment generating development, which may otherwise be delivered. For these reasons Policies EMP2 and EMPI and the supporting text at paragraphs 5.46 and 5.4 as currently drafted are not compatible with National Planning Policy set out in the NPPF and do not represent the most appropriate approach to planning for sustainable economic development. Consequently, it is considered that the draft Local Plan remains unsound' in the context of paragraph 182 of the NPPF and requires amendment as set out below, which would address our objections. Requested Amendments To allow for sustainable economic development opportunities to be delivered at the Chelmsford Road site in particular, the following amendments to the employment policies and text are requested. Policy EMP2 - Existing and Proposed Employment Areas - revise to read as follows (new text underlined and deleted text strike through): Existing and proposed employment areas identified as such on the policies map will be safeguarded for offices, warehouses, industrial and appropriate auxiliary B class employment supporting ' sui generis' and other uses. Planning permission will only be granted for the change of use or redevelopment or extension of sites or premises in these areas for uses other than those identified above in exceptional circumstances where all of the following criteria are met: The proposed use provides an essential community or employment generating benefit which demonstrably cannot be located elsewhere within the area it serves The proposed use would not conflict with any existing or potential other employment uses in the employment area in terms of environmental, traffic generation or any other planning matters; and Where the applicant is able to provide demonstrable proof that the employment use is no longer viable or suitable. The non-viability of employment uses would need to be proven either by marketing or an independent assessment in accordance with the requirements set out in Appendix 5.
- The Council has expended significant effort in developing a strategy for the location of what is claimed to be sustainable economic and housing growth for the next 20 years. In terms of economic development it has obtained and continued to update a review of employment land a key driver of economic growth. The key conclusions of the ELR are that there should be an approach towards to the provision of employment land comprising: Support for appropriate uses within town centres; Protection, but also monitoring, of existing employment sites; Continued growth of appropriate employment at the regionally strategic locations of Stansted Airport and Chesterford Research Park; The delivery of appropriate employment uses within the proposed new settlements; and The identification of suitable new sites to provide flexibility for additional employment growth that is for whatever reasons cannot locate to or is not appropriate on the above sites. The draft Local Plan appears to completely ignore the last of these. In short, the draft Local Plan appears to propose that, for the next 20 years, employment development within the District be constrained to, only: Town centres; Existing employment sites; Stansted Airport

and Chesterford Research Park; and The proposed new settlements. We are of the view that this strategy entirely fails to reflect the conclusions and recommendations of the Council's own evidence base that supposedly provides the justification for the proposed strategy, and will fail to provide the required range and choice of land for employment development. As such, we are of the view that Chapter 3 (Spatial Strategy) and particularly Policy SP4, and Chapter 5 (Employment) and particularly Policies EMP1 and EMP2 do not provide a sound basis for employment development in Uttlesford over the plan period. We are therefore of the view that the draft Local Plan has not been positively prepared, is not justified, will not be effective, and is not consistent with national policy. The Needs of East Hertfordshire In addition, there is no evidence that the needs of Bishop's Stortford, within neighbouring East Hertfordshire and which immediately abuts and is therefore constrained by any proposals within Uttlesford (as well as other factors), have been taken into account or meaningfully discussed and a strategy to address those needs agreed with East Hertfordshire. On this basis, we are also of the view that the draft Local Plan fails the required duty to cooperate.

Policy EMP 1 Employment Strategy and Policy EMP 2 Existing and Proposed Employment Areas. The respondents object to the Plan on the basis that it is not justified, in respect of making sufficient employment land provision. The respondent's own land at the junction of Bedlars Green Road, Dunmow Road and Start Hill, which was put forward as a proposed employment site as part of the Council's Call for site exercise in 2015. The site has not been proposed as an employment allocation in the Draft Plan, which the respondents believe is a missed opportunity, as the proposed allocations do not make adequate provision for the employment needs of the district.

Individuals

Two Individuals responded

Please remove "sui generis" from line 4 and replace with plain English.

P77, EMP2: The conversion of industrial sites to residential should be discouraged.

Sustainability Appraisal June 2017

Significant, Temporal and Secondary Effects

This policy seeks to retain employment areas which will have positive impacts on the supply of sustainable employment provision and the provision of employment based training opportunities by safeguarding existing employment areas and only allowing a change of use from employment in exceptional circumstances. The flexibility in the policy ensures an ability to respond to future conditions in light of the potential unviability of employment land in the future, however maintains a stance of that reflects the disparate location and provision of employment land across the district. The policy therefore responds to a sustainable use of land as a resource within a local context, whilst also complying with paragraph 22 of the NPPF ('Planning policies should avoid the long term protection of sites allocated for employment use where there is no reasonable prospect of a site being used for that purpose. Land allocations should be regularly reviewed. Where there is no reasonable prospect of a site being used for the allocated employment use, applications for alternative uses of land or buildings should be treated on their merits having regard to market signals and the relative need for different land uses to support sustainable local communities'). There will additionally be secondary positive impacts on promoting accessibility and encouraging the use of sustainable travel by retaining existing and proposed employment sites, ensuring that settlements remain sustainable in providing both jobs and homes where this is evident.

Alternatives Considered

One alternative policy approach has been considered reasonable.

- Alternative EMP2(a): Allow the release of existing industrial estates for residential purposes, where there is a developer interest and the site is well located, and seek to find compensatory provision as and when the need arises.

Summary of effects and reason for rejection

Although the alternative could arguably be considered NPPF compliant and in adherence to a presumption in favour of sustainable development, allowing the release of existing industrial uses for residential purposes can be seen as a generally unsustainable approach within the context of Uttlesford and in response to a concentration of the District's employment land at Stansted airport. For this purpose, the alternative can be seen to have uncertain impacts regarding accessibility and sustainable transport as well as economic growth, in the absence of any details as to the location, sustainability and general quality of compensatory provision. For these reasons the alternative has been rejected.

Proposed Mitigation Measures / Recommendations

No mitigation measures or recommendations are proposed.

Non-Estate Employment Uses

Policy EMP3

This policy was responded to by 6 people/organisations.

Support	1
Object	0
Comment	5

Overarching Summary

- EMP3: As before with improved enforcement criteria for evidence base Appendix 5;
- Again, why invite change of use?
- Change of use should not be encouraged beyond what is already permitted development. To note Saffron Walden Business Centre (map18) is not shown on Saffron Walden inset map "is not shown as employment area. Proposed Change: Note error on map which needs to be amended
- To be commended - Support policy

Statutory consultees and other bodies

Saffron Walden Neighbourhood Plan Steering Group - Again, why invite change of use?

Walden Town Council - Change of use should not be encouraged beyond what is already permitted development. To note Saffron Walden Business Centre (map18) is not shown on Saffron Walden inset map is not shown as employment area. Proposed Change: Note error on map which needs to be amended

Thaxted Parish Council - To be commended - Support policy

Developers/landowners/site promoters

The Thaxted Society - EMP3 As before with improved enforcement criteria for evidence base Appendix 5.
As before with improved enforcement criteria for evidence base Appendix 5

Individuals

- No individuals responded.

Sustainability Appraisal June 2017

Significant, Temporal and Secondary Effects

Employment sites which are located outside of industrial estates provide a large proportion of the employment in the district and are important contributors to the local economy. It is therefore important that safeguards are made through policy to ensure these sites are retained for employment uses where they are viable but allow flexibility to respond to instances where sites are no longer suitable for employment. The flexible approach taken forward in this policy safeguards employment sites in the first instance but allows for sites that have outlived their viability to be changed into more suitable uses providing justification is proven. This ensures that employment provision is suitably and sustainably located and could also provide additional land for residential development which would have positive impacts on addressing housing need. Ensuring that uses are more suitably located would also positively impact on accessibility and will lead to a comparative reduction in vehicle emissions.

Alternatives Considered

One alternative policy approach has been considered reasonable.

- Alternative EMP3(a): Policy to protect all existing employment sites from changes to other uses

Summary of effects and reason for rejection

This alternative will have a range of positive, negative and uncertain impacts on sustainability objectives. There will be uncertain impacts on townscapes, should existing employment land be protected in perpetuity and this will also give rise to negative impacts regarding the sustainable use of land. There will be uncertain impacts on accessibility to jobs and housing growth, should viable residential development be deemed unsuitable on previous although vacant employment land. This is also unlikely to stimulate further employment development, should safeguarded land be undesirable. It is acknowledged that it is important to retain sites; however such a policy approach is inflexible, would not respond well to growth and development needs on a district-wide basis and does not conform to elements of National Policy. As such, this approach has been rejected.

Proposed Mitigation Measures / Recommendations

No mitigation measures or recommendations are proposed.

Existing Employment Areas

Paragraph 5.48

This paragraph was responded to by one individual.

Support	0
Object	0
Comment	1

Overarching Summary

- Accepting that rural economy needs protecting, maybe, 1% of housing stock could be released on an agricultural tenancy, therefore giving low paid farmworkers a home.

Statutory consultees and other bodies

None

Developers/landowners/site promoters

None

Individuals

- Accepting that rural economy needs protecting, maybe, 1% of housing stock could be released on an agricultural tenancy, therefore giving low paid farmworkers a home.

Sustainability Appraisal June 2017

Not applicable

Rural Economy

Policy EMP4

This policy was responded to by 5 organisations and 2 individuals.

Support	4
Object	1
Comment	2

Overarching Summary

- Broadly in support of this policy, as recent experience has shown that re-allocation of vacant farm buildings and agricultural use to full scale employment use provides a welcome supply of new accommodation and a sensible re-use of otherwise redundant buildings.
- Support wholeheartedly. Examples are both imaginative and visionary. Re-use and adaptation should be the bywords for rural commercial development and the Society's policy of encouraging a revival in crafts and making fits well with this policy.
- Support the Policy. Please ensure more bridleways are provided that link up to the existing network.
- The plan abuses the local environment.
- Rural Economy - No mention of sustainability.
- Saffron Walden also needs a hotel badly as Cambridge cannot meet current demand. Saffron Hall is limited in its offering as rooms are needed for orchestras etc.
- Schemes should be encouraged to generate their own energy and to minimise use of the car.
- Welcome requirements within this policy for development proposals to respect landscape character. Request that a similar level of protection is added for the wider historic environment.
- The policy seeks to encourage tourism and therefore it would be pertinent to refer to the potential that developments of tourist and leisure facilities may have in enhancing, better revealing and providing access to the historic environment.

Statutory consultees and other bodies

Coke Gearing Limited - Once again we are broadly in support of the Council's policy here, as in our recent experience re-allocation of vacant farm buildings and agricultural use to full scale employment use provides a welcome supply of new accommodation and a sensible re-use of otherwise redundant buildings.

The Thaxted Society - EMP4 Support wholeheartedly. Examples are both imaginative and visionary. Re-use and adaptation should be the bywords for rural commercial development at Uttlesford and the Society's policy of encouraging a revival in crafts and making fits well with this policy.

Saffron Neighbourhood Plan Steering Group - No mention of sustainability. Schemes should be encouraged to generate their own energy and to minimise use of the car. Saffron Walden also needs a hotel badly as Cambridge cannot meet current demand. Saffron Hall is limited in its offering as rooms are needed for orchestras etc.

Historic Environment - We welcome the requirements within this policy for development proposals to respect landscape character. We request that a similar level of protection is added for the wider historic environment. The policy seeks to encourage tourism and therefore it would be pertinent to refer to the potential that developments of tourist and leisure facilities may have in enhancing, better revealing and providing access to the historic environment. The policy also identifies the role that the re-use of rural buildings has to play in supporting the local rural economy. The reuse of traditional buildings and finding viable uses for vacant or derelict historic buildings can help support a vibrant rural economy provided the reuse of the building is commensurate with its conservation.

Developers/landowners/site promoters

None

Individuals

Two Individuals responded.

Thank you for finally mentioning equestrian. We contribute a lot to the local economy. Please ensure more bridleways are provided that link up to the existing network.

The plan abuses the local environment.

Sustainability Appraisal June 2017

Significant, Temporal and Secondary Effects

This policy would have positive impacts on the natural environment where a criterion stipulates that development will only be permitted where it protects or enhances the character of the countryside and its biodiversity value. The policy will also have significant positive secondary effects on landscape, through re-use, and also the sustainable use of land. Impacts on the historic environment are uncertain in association with the possibility that redundant rural buildings are historic in nature and could be non-designated heritage assets that otherwise are not covered by policy within the Plan.

Alternatives Considered

One alternative policy approach has been considered reasonable.

- Alternative EMP4(a): For the re-use of rural buildings outside development limits to be limited to employment purposes; or if demonstrably unviable, then for another non-residential use, or for residential use only if all other types of use are demonstrably unviable (as proven either by Summary of effects and reason for rejection

Although paragraph 28 of the NPPF requires Local Plans to promote a strong rural economy by enabling the growth and expansion of rural businesses and enterprises through the conversion of existing buildings. Nevertheless, Permitted Development rights allow the change of use of agricultural buildings for a range of uses subject to certain criteria being met. The Preferred policy approach only applies in those cases where planning consent is required. The implications of the Policy are that not all buildings will necessarily be appropriate for some form of beneficial use; however the alternative can be seen to conflict with the

possibility that rural buildings may be suitable for non-employment uses and a general presumption in favour of sustainable of non-employment development in such areas. For this reason the alternative has been rejected in favour of a less constrained approach as espoused in the Policy. The alternative is also likely to lead to fewer schemes being viable in rural areas, which remain redundant and do not improve local landscape and townscape as a result.

Proposed Mitigation Measures / Recommendations

No mitigation measures or recommendations are proposed.